

**APPLICATION FOR RENEWAL OF TIER I AIR OPERATING PERMIT - BLACKFOOT
FACILITY OF BASIC AMERICAN FOODS**

Continuing Compliance Demonstration

Continuing Compliance Certification

This emissions unit will continue to comply with this applicable requirement.

Methods of Demonstrating Continuing Compliance

Compliance will be demonstrated by estimating emissions from boiler operating records (fuel usage or steam production) and emission factors used in the permit analysis. Tuning of Boiler 1 in accordance with PTC No. P-050301, Condition 3.8 will help ensure that the emission factors used to estimate emissions are still valid.

Reporting Methods and Frequencies

BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I Permit Compliance Report will either certify compliance with this requirement, or if compliance cannot be certified, will provide an appropriate compliance schedule.

OPERATING REQUIREMENTS – BOILER 2

The following operating requirements apply to Boiler 2.

40 CFR Part 60 Subpart A General Provisions

40 CFR 60 Subpart A; PTC No. P-050301, Condition 4.14

The permittee shall comply with the requirements of 40 CFR 60 Subpart A for Boiler 2 including, but not limited to, notification of commencement of construction within 30 days of commencement and notification of actual date of startup postmarked within 15 days of that date.

Enforceability

Federally Enforceable

Applicable Monitoring, Recordkeeping and Reporting Requirements

None specific to this requirement. All applicable monitoring, recordkeeping, and reporting requirements are identified in other applicable requirements.

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Evaluation of Current Compliance

In Compliance Now?

Yes

Basis for Determining Current Compliance Status:

BAF is in compliance with the specific applicable provisions of 40 CFR Subpart A, as detailed in other applicable requirements. Required notifications were made to EPA of commencement of construction, anticipated startup date, and actual startup date.

Continuing Compliance Demonstration

Continuing Compliance Certification

This emissions unit will continue to comply with this applicable requirement.

Methods of Demonstrating Continuing Compliance

Compliance with this requirement will be demonstrated by compliance with the specific applicable provisions of 40 CFR Subpart A detailed in other applicable requirements.

Reporting Methods and Frequencies

BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I Permit Compliance Report will either certify compliance with this requirement, or if compliance cannot be certified, will provide an appropriate compliance schedule.

Wet Scrubbing System Operation

NSPS Subpart Dc Alternative to COMS for Boiler Re-firing Project at Blackfoot, Idaho (approved by EPA Region X, 29 Sep 2005), Provision 1

The wet scrubbing system shall be operated during all times that residual oil is fired in Boiler 2. Basic American Foods shall install, calibrate, operate, and maintain equipment to measure each of the following operating parameters for the wet scrubbing system. Each of the following operating parameters shall be maintained within the specifications established in the permit or specifications established through source testing under worse case normal conditions.

e) Pressure drop across the scrubber

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- f) Scrubbing solution pH
- g) Scrubbing solution flowrate.
- h) Fuel consumption
- i) Steam production (calculated)

Enforceability

Federally Enforceable

Applicable Monitoring, Recordkeeping and Reporting Requirements

NSPS Subpart Dc Alternative to COMS for Boiler Re-firing Project at Blackfoot, Idaho (approved by EPA Region X, 29 Sep 2005), Provision 4

Evaluation of Current Compliance

In Compliance Now?

Yes

Basis for Determining Current Compliance Status:

Review of scrubber operating records shows that the scrubber operated at all times when #6 oil was fired in Boiler 2. Boiler 2 combusted #6 oil only for purposes of startup and initial performance testing. During this time the boilers and the scrubber were operated in accordance with provisions established in PTC P-050301.

Continuing Compliance Demonstration

Continuing Compliance Certification

This emissions unit will continue to comply with this applicable requirement.

Methods of Demonstrating Continuing Compliance

Review of Boiler and wet scrubber operating records.

Reporting Methods and Frequencies

Monitoring data reports will be submitted every six months, in accordance with provisions of the Tier I permit (IDAPA 58.01.01.322.08.c).

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BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I Permit Compliance Report will either certify compliance with this requirement, or if compliance cannot be certified, will provide an appropriate compliance schedule.

Calibration of Wet Scrubber Monitoring Instrumentation

NSPS Subpart Dc Alternative to COMS for Boiler Re-firing Project at Blackfoot, Idaho (approved by EPA Region X, 29 Sep 2005), Provision 2

Basic American Foods shall calibrate each instrument [used to monitor wet scrubber operation pursuant to NSPS Subpart Dc Alternative to COMS for Boiler Re-firing Project at Blackfoot, Idaho (approved by EPA Region X, 29 Sep 2005), Provision 1] in accordance with the manufacturer's recommendation; nevertheless, Basic American Foods shall calibrate each piece of equipment at least every six months.

Enforceability

Federally Enforceable

Applicable Monitoring, Recordkeeping and Reporting Requirements

NSPS Subpart Dc Alternative to COMS for Boiler Re-firing Project at Blackfoot, Idaho (approved by EPA Region X, 29 Sep 2005), Provision 2

Evaluation of Current Compliance

In Compliance Now?

Yes

Basis for Determining Current Compliance Status:

Review of scrubber operating files shows that all independently calibrated equipment has been calibrated within the last six months. Manufacturer documentation of self-calibration is available on site for all equipment that is self-calibrating.

Continuing Compliance Demonstration

Continuing Compliance Certification

This emissions unit will continue to comply with this applicable requirement.

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Methods of Demonstrating Continuing Compliance

Review of scrubber operating files to verify that all independently calibrated equipment has been calibrated within the last six months and that manufacturer documentation of self-calibration is available on site for all equipment that is self-calibrating.

Reporting Methods and Frequencies

BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I Permit Compliance Report will either certify compliance with this requirement, or if compliance cannot be certified, will provide an appropriate compliance schedule.

Consistency of Alternative Opacity Monitoring Plan with PTC No. P-050301

NSPS Subpart Dc Alternative to COMS for Boiler Re-firing Project at Blackfoot, Idaho (approved by EPA Region X, 29 Sep 2005), Provision 3

Section 4.5 of the PTC references this alternative monitoring plan. This section of the plan references the permit. If a change to the permit will affect this plan, Basic American Foods shall request a change to this monitoring plan and a change to the permit. If a change to this plan will not affect the permit, only a change to this plan is required to be requested. When a permit change is requested that will not affect this plan, only the permit change is required to be requested. This requirement is to ensure the monitoring plan and the permit remain consistent as future changes are made to either the permit or this monitoring plan.

Enforceability

Federally Enforceable

Applicable Monitoring, Recordkeeping and Reporting Requirements

None

Evaluation of Current Compliance

In Compliance Now?

Yes

Basis for Determining Current Compliance Status:

There have been no changes to either the alternative monitoring plan or the permit.

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Continuing Compliance Demonstration

Continuing Compliance Certification

This emissions unit will continue to comply with this applicable requirement.

Methods of Demonstrating Continuing Compliance

If there is a change in either the alternative monitoring plan or the permit (or both), the changes will be reviewed to ensure monitoring plan and the permit are consistent with each other.

Reporting Methods and Frequencies

BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I Permit Compliance Report will either certify compliance with this requirement, or if compliance cannot be certified, will provide an appropriate compliance schedule.

Maintenance of Facilities and Air Pollution Control Equipment

40 CFR 60.11(d); PTC No. P-050301, Condition 3.9

At all times, including periods of startup, shutdown, and malfunction, BAF shall, to the extent practicable, maintain and operate Boiler 2 including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions in accordance with 40 CFR 60.11(d).

Enforceability

Federally Enforceable

Applicable Monitoring, Recordkeeping and Reporting Requirements

PTC No. P-050301, Condition 4.11

Evaluation of Current Compliance

In Compliance Now?

Yes

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Basis for Determining Current Compliance Status:

Boilers 1 and 2 have been rehabilitated in the last two years to combust #6 oil, and a wet scrubber was installed. This equipment is sufficiently new that only routine maintenance has been needed.

In addition the burners for each boiler are tuned annually in accordance with Provision 3.13 of the existing Tier I Air Operating Permit.

The wet scrubber is operated in accordance with the O&M Manual prepared for the wet scrubber pursuant to PTC No. P-050301, Condition 3.7.

Continuing Compliance Demonstration

Continuing Compliance Certification

This emissions unit will continue to comply with this applicable requirement.

Methods of Demonstrating Continuing Compliance

Continuing compliance will be demonstrated via records of boiler tuning and of scrubber operation and maintenance in accordance with the O&M Manual.

Reporting Methods and Frequencies

BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I Permit Compliance Report will either certify compliance with this requirement, or if compliance cannot be certified, will provide an appropriate compliance schedule.

Concealment

40 CFR 60.11

No owner or operator subject to the provisions of this part shall build, erect, install, or use any article, machine, equipment or process, the use of which conceals an emission which would otherwise constitute a violation of an applicable standard. Such concealment includes, but is not limited to, the use of gaseous diluents to achieve compliance with an opacity standard or with a standard which is based on the concentration of a pollutant in the gases

Enforceability

Federally Enforceable

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Applicable Monitoring, Recordkeeping and Reporting Requirements

None

Evaluation of Current Compliance

In Compliance Now?

Yes

Basis for Determining Current Compliance Status:

Facility knowledge.

Continuing Compliance Demonstration

Continuing Compliance Certification

This emissions unit will continue to comply with this applicable requirement.

Methods of Demonstrating Continuing Compliance

BAF will annually verify that no concealment devices have been installed or used.

Reporting Methods and Frequencies

BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I Permit Compliance Report will either certify compliance with this requirement, or if compliance cannot be certified, will provide an appropriate compliance schedule.

MONITORING REQUIREMENTS – BOILER 2

The following monitoring requirements apply to Boiler 2.

Performance Testing - General

40 CFR 60.11(a)

Compliance with standards in 40 CFR Part 60, other than opacity standards, shall be determined in accordance with performance tests established by § 60.8, unless otherwise specified in the applicable standard.

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Enforceability

Federally Enforceable

Applicable Monitoring, Recordkeeping and Reporting Requirements

40 CFR 60.7(f)

40 CFR 60.48c(b)

PTC No. P-050301, Condition 5.1.2

Evaluation of Current Compliance

In Compliance Now?

Yes

Basis for Determining Current Compliance Status:

Compliance with the particulate matter and sulfur dioxide standards is based on data from performance test conducted in accordance with 40 CFR 60.8.

Continuing Compliance Demonstration

Continuing Compliance Certification

This emissions unit will continue to comply with this applicable requirement.

Methods of Demonstrating Continuing Compliance

Continuing compliance will be demonstrated by determining compliance from emission measurements conducted in accordance with the provisions 40 CFR 60.8

Reporting Methods and Frequencies

Monitoring data reports will be submitted every six months, in accordance with provisions of the Tier I permit (IDAPA 58.01.01.322.08.c.

BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I Permit Compliance Report will either certify compliance with this requirement, or if compliance cannot be certified, will provide an appropriate compliance schedule.

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Performance Testing - CEMS

40 CFR 60.13(c)

The owner or operator of an affected facility shall conduct a performance evaluation of the continuous emission monitoring system (CEMS) during any performance test required under §60.8 or within 30 days thereafter in accordance with the applicable performance specification in appendix B of this part, The owner or operator of an affected facility shall conduct CEMS performance evaluations at such other times as may be required by the Administrator under section 114 of the Act.

Enforceability

Federally Enforceable

Applicable Monitoring, Recordkeeping and Reporting Requirements

40 CFR 60.48c(i)

40 CFR 60.48c(e)

PTC No. P-050301, Condition 5.1.5

PTC No. P-050301, Condition 4.10.2

40 CFR 60.48c(b)

PTC No. P-050301, Condition 5.1.2

40 CFR 60.48c(b)

PTC No. P-050301, Condition 5.1.2

40 CFR 60.48c(e)

PTC No. P-050301, Condition 5.1.5

Evaluation of Current Compliance

In Compliance Now?

Yes

Basis for Determining Current Compliance Status:

BAF conducted the performance testing of Boiler 2 on June 6 and 8, 2006. The performance evaluation report has not yet been submitted to EPA because 60 days have not elapsed from the time of the performance evaluation.

Continuing Compliance Demonstration

Continuing Compliance Certification

This emissions unit will continue to comply with this applicable requirement.

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Methods of Demonstrating Continuing Compliance

Performance test records will be used to document that any future performance evaluation tests comply with 40 CFR 60.13(c)

Reporting Methods and Frequencies

For future performance evaluation reports, two copies of a written performance evaluation report will be submitted to EPA within 60 days of completion of the performance evaluation.

If any future performance evaluations are completed, a summary of the test results will be included in the semi-annual monitoring data, in accordance with provisions of the Tier I permit (IDAPA 58.01.01.322.08.c).

BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I Permit Compliance Report will either certify compliance with this requirement, or if compliance cannot be certified, will provide an appropriate compliance schedule.

Performance Testing- Number of Sampling Runs

40 CFR 60.8(f)

Unless otherwise specified in the applicable subpart, each performance test shall consist of three separate runs using the applicable test method. Each run shall be conducted for the time and under the conditions specified in the applicable standard. For the purpose of determining compliance with an applicable standard, the arithmetic means of results of the three runs shall apply. In the event that a sample is accidentally lost or conditions occur in which one of the three runs must be discontinued because of forced shutdown, failure of an irreplaceable portion of the sample train, extreme meteorological conditions, or other circumstances, beyond the owner or operator's control, compliance may, upon the Administrator's approval, be determined using the arithmetic mean of the results of the two other runs.

Enforceability

Federally Enforceable

Applicable Monitoring, Recordkeeping and Reporting Requirements

None

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Evaluation of Current Compliance

In Compliance Now?

Yes

Basis for Determining Current Compliance Status:

Review of performance test reports prepared for PM and sulfur dioxide performance testing conducted June 6 and 8, 2006.

Continuing Compliance Demonstration

Continuing Compliance Certification

This emissions unit will continue to comply with this applicable requirement.

Methods of Demonstrating Continuing Compliance

Review of performance test reports prepared for future performance tests.

Reporting Methods and Frequencies

BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I Permit Compliance Report will either certify compliance with this requirement, or if compliance cannot be certified, will provide an appropriate compliance schedule.

Performance Testing – NSPS boilers

40 CFR 60.8, 60.11; PTC No. P-050301, Sec 4.1

Performance testing conducted for Boiler 2 under 40 CFR Part 60 Subpart Dc shall be performed in accordance with 40 CFR 60 Subpart A, including but not limited to the following requirements under 40 CFR 60.8 and 60.11:

- Within 60 days after achieving the maximum production rate at which Boiler 2 facility will be operated, but not later than 180 days after initial startup of such facility and at such other times as may be required by the EPA Administrator under section 114 of the Act, the owner or operator of such facility shall conduct performance test(s) and furnish the EPA Administrator a written report of the results of such performance test(s) in accordance with 40 CFR 60.8(a).
- For the purpose of demonstrating initial compliance, opacity observations shall be conducted concurrently with the initial performance test required in 40 CFR 60.8 except as otherwise provided in 40 CFR 60.11(e)(1).

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- Performance tests shall be conducted and data reduced in accordance with the test methods and procedures contained in 40 CFR 60 Subpart Dc unless the EPA Administrator provides otherwise in accordance with 40 CFR 60.8(b).
- Performance tests shall be conducted under such conditions as the EPA Administrator shall specify to the plant operator based on representative performance of the affected facility. The owner or operator shall make available to the EPA Administrator such records as may be necessary to determine the conditions of the performance tests. Operations during periods of startup, shutdown, and malfunction shall not constitute representative conditions for the purpose of a performance test nor shall emissions in excess of the level of the applicable emission limit during periods of startup, shutdown, and malfunction be considered a violation of the applicable emission limit unless otherwise specified in the applicable standard in accordance with 40 CFR 60.8(c).

Enforceability

Federally Enforceable

Applicable Monitoring, Recordkeeping and Reporting Requirements

40 CFR 60.7(f)

40 CFR 60.48c(b)

PTC No. P-050301, Condition 5.1.2

IDAPA 58.01.01.157

PTC No. P-050301, Condition 5.3

Evaluation of Current Compliance

In Compliance Now?

Yes

Basis for Determining Current Compliance Status:

Due to operational difficulties during startup, BAF was not able to complete performance testing within 180 days after startup. BAF advised EPA of the situation, and received concurrence to extend the deadline in accordance with 40 CFR 60.8(d). The performance testing of Boiler 2 was completed on June 6 and 8, 2006. Opacity observations were conducted at the same time as the performance.

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Continuing Compliance Demonstration

Continuing Compliance Certification

This emissions unit will continue to comply with this applicable requirement.

Methods of Demonstrating Continuing Compliance

Performance test records for future performance tests will be used to demonstrate compliance with this requirement for any future performance tests.

Reporting Methods and Frequencies

For future performance evaluation reports, two copies of a written performance evaluation report will be submitted to EPA within 60 days of completion of the performance evaluation.

If any future performance evaluations are completed, a summary of the test results will be included in the semi-annual monitoring data, in accordance with provisions of the Tier I permit (IDAPA 58.01.01.322.08.c).

BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I Permit Compliance Report will either certify compliance with this requirement, or if compliance cannot be certified, will provide an appropriate compliance schedule.

CEMS Performance Testing

40 CFR 60.13(b)

All continuous monitoring systems and monitoring devices shall be installed and operational prior to conducting performance tests under § 60.8. Verification of operational status shall, as a minimum, include completion of the manufacturer's written requirements or recommendations for installation, operation, and calibration of the device. COMS and CEMS shall be calibrated in accordance with 40 CFR 60.13(d).

Enforceability

Federally Enforceable

Applicable Monitoring, Recordkeeping and Reporting Requirements

40 CFR 60.7(f)

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Evaluation of Current Compliance

In Compliance Now?

Yes

Basis for Determining Current Compliance Status:

Operational status of the CEMS was verified before the initial performance test.

Continuing Compliance Demonstration

Continuing Compliance Certification

This emissions unit will continue to comply with this applicable requirement.

Methods of Demonstrating Continuing Compliance

BAF will confirm that the CEMS is operational before conducting any future performance tests.

Reporting Methods and Frequencies

BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I Permit Compliance Report will either certify compliance with this requirement, or if compliance cannot be certified, will provide an appropriate compliance schedule.

Performance Testing Notification

40 CFR 60.8(d); 40 CFR 60.44c(a)

The owner or operator of an affected facility shall provide the Administrator at least 30 days prior notice of any performance test, except as specified under other subparts, to afford the Administrator the opportunity to have an observer present. If after 30 days notice for an initially scheduled performance test, there is a delay (due to operational problems, etc.) in conducting the scheduled performance test, the owner or operator of an affected facility shall notify the Administrator (or delegated State or local agency) as soon as possible of any delay in the original test date, either by providing at least 7 days prior notice of the rescheduled date of the performance test, or by arranging a rescheduled date with the Administrator (or delegated State or local agency) by mutual agreement. The 30-day notice required in 40 CFR 60.8(d) applies only to the initial performance test unless otherwise specified by the EPA Administrator in accordance with 40 CFR 60.44c(a).

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Enforceability

Federally Enforceable

Applicable Monitoring, Recordkeeping and Reporting Requirements

40 CFR 60.7(f)

40 CFR 60.7(a)(5)

40 CFR 60.7(a)(6)

Evaluation of Current Compliance

In Compliance Now?

Yes

Basis for Determining Current Compliance Status:

BAF provided 30-days notice to EPA before the initial performance test. Note that the initial performance test has been delayed due to operational difficulties and testing rescheduled in accordance with 40 CFR 60.8(d).

Continuing Compliance Demonstration

Continuing Compliance Certification

This emissions unit will continue to comply with this applicable requirement.

Methods of Demonstrating Continuing Compliance

Notices for future performance tests to demonstrate compliance.

Reporting Methods and Frequencies

BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I Permit Compliance Report will either certify compliance with this requirement, or if compliance cannot be certified, will provide an appropriate compliance schedule.

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Alternative Opacity Monitoring Procedures

40 CFR 60.13; PTC No. P-050301, Condition 4.5

After receipt and consideration of a written application, the EPA Administrator may approve alternatives to any monitoring procedures or requirements of 40 CFR Part 60 in accordance with 40 CFR 60.13(i). If approved, provisions of the alternate opacity monitoring plan will replace permit provisions requiring a COMS. A copy of the EPA-approved alternative monitoring plan and the written EPA approval shall be sent to DEQ.

Enforceability

Federally Enforceable

Applicable Monitoring, Recordkeeping and Reporting Requirements

450 CFR 60.7(f)

Evaluation of Current Compliance

In Compliance Now?

Yes

Basis for Determining Current Compliance Status:

Compliance determined from review of records and correspondence. EPA has approved an alternate opacity monitoring plan, and the plan with EPA approval has been provided to DEQ.

Continuing Compliance Demonstration

Continuing Compliance Certification

This emissions unit will continue to comply with this applicable requirement.

Methods of Demonstrating Continuing Compliance

Correspondence files will be reviewed to verify that any changes to the alternate opacity monitoring plan have been approved by EPA, and the revised plan and EPA approval have been provided to DEQ.

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Reporting Methods and Frequencies

BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I Permit Compliance Report will either certify compliance with this requirement, or if compliance cannot be certified, will provide an appropriate compliance schedule.

Continuous Emissions Monitoring Systems – Operating Requirements

40 CFR 60.13(e)

Except for system breakdowns, repairs, calibration checks, and zero and span adjustments required under paragraph (d) of this section, all continuous monitoring systems shall be in continuous operation and shall meet minimum frequency of operation requirements as follows:

- (1) All continuous monitoring systems referenced by paragraph (c) of this section for measuring opacity of emissions shall complete a minimum of one cycle of sampling and analyzing for each successive 10-second period and one cycle of data recording for each successive 6-minute period.
- (2) All continuous monitoring systems referenced by paragraph (c) of this section for measuring emissions, except opacity, shall complete a minimum of one cycle of operation (sampling, analyzing, and data recording) for each successive 15-minute period.

Enforceability

Federally Enforceable

Applicable Monitoring, Recordkeeping and Reporting Requirements

40 CFR 60.7(b)

40 CFR 60.7(f)

Evaluation of Current Compliance

In Compliance Now?

Yes

Basis for Determining Current Compliance Status:

Review of data from sulfur dioxide CEMS and of scrubber operating parameters collected pursuant to alternate opacity monitoring plan.

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Continuing Compliance Demonstration

Continuing Compliance Certification

This emissions unit will continue to comply with this applicable requirement.

Methods of Demonstrating Continuing Compliance

Review of data from sulfur dioxide CEMS and of scrubber operating parameters collected pursuant to alternate opacity monitoring plan.

Reporting Methods and Frequencies

Monitoring data reports will be submitted every six months, in accordance with provisions of the Tier I permit (IDAPA 58.01.01.322.08.c. These reports will include information on data availability for the sulfur dioxide CEMS and for scrubber operating data collected pursuant to the alternate opacity monitoring program.

BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I Permit Compliance Report will either certify compliance with this requirement, or if compliance cannot be certified, will provide an appropriate compliance schedule.

Opacity Monitoring – Visual Observations

NSPS Subpart Dc Alternative to COMS for Boiler Re-firing Project at Blackfoot, Idaho (approved by EPA Region X, 29 Sep 2005), Provisions 5, 6, and 7

Basic American Foods shall conduct a 6-minute opacity observation every day for days 1-14 of operation when Boiler 2 combusts fuel oil to monitor directly the opacity of emissions from the stack. Thereafter, Basic American Foods shall conduct a 6-minute opacity observation once every 14 days for days 15-45 of operation when Boiler 2 combusts fuel oil to directly monitor the opacity of emissions from the stack. Thereafter, Basic American Foods shall conduct a 6-minute opacity observation once every 30 days for days of operation from day 46 when Boiler 2 combusts fuel oil to directly monitor the opacity of emissions from the stack. Opacity observations shall be conducted utilizing Method 9. Note that Boiler 1 is not subject to the NSPS; therefore, this requirement does not apply to Boiler 1, except when Boiler 1 operates simultaneously when Boiler 2 combusts fuel oil. To clarify, there will be fourteen (14) data points according to the first requirement, two (2) data points in accordance with the second requirement, and one (1) data point every 30 days thereafter when Boiler 2 combusts fuel oil.

If any 6-minute opacity observation results in any single observation greater than 20%, Basic American Foods shall conduct a 60-minute Method 9 opacity observation. If the 60 minute opacity observation results in opacity greater than 20% for any 6-minute period, except for one 6-minute period (average) of not more than 27% opacity, then Basic American Foods shall revert back to the start of the schedule outlined above in

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item number 5 (i.e., collecting fourteen (14) data points according to the first requirement, two (2) data points in accordance with the second requirement, and one (1) data point every 30 days thereafter when Boiler 2 combusts fuel oil.)

If the opacity exceeds 20%, Basic American Foods shall take immediate corrective action to reduce the opacity. Opacity observations and corrective actions shall be documented hourly when opacity is greater than 20%.

Enforceability

Federally Enforceable

Applicable Monitoring, Recordkeeping and Reporting Requirements

NSPS Subpart Dc Alternative to COMS for Boiler Re-firing Project at Blackfoot, Idaho (approved by EPA Region X, 29 Sep 2005), Provision 7

Evaluation of Current Compliance

In Compliance Now?

Yes

Basis for Determining Current Compliance Status:

BAF has completed opacity observations in accordance with this requirement through the first 45 days of operation of Boiler 2 while firing fuel oil. Because none of the observations exceeded 20% opacity, it has not been necessary to restart the opacity observation program.

Since completing the initial 45 day opacity observation program, the boiler has not combusted fuel for 30 or more days. Accordingly, there has been no requirement to conduct a 30-day opacity observation.

Continuing Compliance Demonstration

Continuing Compliance Certification

This emissions unit will continue to comply with this applicable requirement.

Methods of Demonstrating Continuing Compliance

Fuel usage records will be used to establish days on which fuel oil is combusted. Opacity observation records will then be used to establish that opacity observations

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were completed as required by this provision and that corrective actions were taken when opacity exceeded 20%.

Reporting Methods and Frequencies

Monitoring data reports will be submitted every six months, in accordance with provisions of the Tier I permit (IDAPA 58.01.01.322.08.c.

BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I Permit Compliance Report will either certify compliance with this requirement, or if compliance cannot be certified, will provide an appropriate compliance schedule.

Performance Testing - Opacity

40 CFR 60.45c; PTC No. P-050301, Sec 4.3

In accordance with 40 CFR 60.45c(a), the owner or operator of an affected facility subject to the opacity standards under 40 CFR 60.43c shall conduct an initial performance test as required under 40 CFR 60.8, and shall conduct subsequent performance tests as requested by the EPA Administrator, to determine compliance with the standards using the following procedures and reference methods: Method 9 (six-minute average of 24 observations) shall be used for determining the opacity of stack emissions in accordance with 40 CFR 60.45c(a)(8).

40 CFR 60.11(b), (e)

Compliance with opacity standards in 40 CFR Part 60 shall be determined by conducting observations in accordance with Method 9 in appendix A of 40 CFR 60 or any alternative method that is approved by the Administrator. For purposes of determining initial compliance, the minimum total time of observations shall be 3 hours (30 6-minute averages) for the performance test or other set of observations (meaning those fugitive-type emission sources subject only to an opacity standard).

Opacity observation shall be conducted in accordance with 40 CFR 60.11(e)

Enforceability

Federally Enforceable

Applicable Monitoring, Recordkeeping and Reporting Requirements

40 CFR 60.7(a)(5)

40 CFR 60.7(a)(6)

40 CFR 60.7(f)

40 CFR 60.11(e)

IDAPA 58.01.01.157

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PTC No. P-050301, Condition 5.3

40 CFR 60.7(a)(5)

40 CFR 60.7(f)

NSPS Subpart Dc Alternative to COMS for Boiler Re-firing Project at Blackfoot, Idaho (approved by EPA Region X, 29 Sep 2005), Provision 5, 6, and 7

Evaluation of Current Compliance

In Compliance Now?

Yes.

Basis for Determining Current Compliance Status:

BAF completed initial opacity performance tests of Boiler 2 on June 6 and 8, 2006 using Method 9 (six-minute averages of 24 observations), simultaneous with particulate matter performance tests of Boiler 2 conducted on these dates. The total observation time for these tests was 8 hours (four two-hour performance tests).

Continuing Compliance Demonstration

Continuing Compliance Certification

This emissions unit will continue to comply with this applicable requirement.

Methods of Demonstrating Continuing Compliance

Continuing compliance will be demonstrated using records of wet scrubber operating parameters and routine visual observations of exhaust opacity, in accordance with Provisions 5 through 7 of the EPA-approved alternative opacity monitoring plan (NSPS Subpart Dc Alternative to COMS for Boiler Re-firing Project at Blackfoot, Idaho (approved by EPA Region X, 29 Sep 2005)).

Reporting Methods and Frequencies

For future performance evaluation reports, two copies of a written performance evaluation report will be submitted to EPA within 60 days of completion of the performance evaluation. If any future performance evaluations are completed, a summary of the test results will be included in the semi-annual monitoring data, in accordance with provisions of the Tier I permit (IDAPA 58.01.01.322.08.c).

Monitoring data reports will be submitted every six months, in accordance with provisions of the Tier I permit (IDAPA 58.01.01.322.08.c).

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BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I Permit Compliance Report will either certify compliance with this requirement, or if compliance cannot be certified, will provide an appropriate compliance schedule.

Continuous Emission Monitoring - SO2

40 CFR 60.13(b), 60.46c; PTC No. P-050301, Condition 4.4

In accordance with 40 CFR 60.46c(a), except as provided in 40 CFR 60.46c(d) and (e), the owner or operator of an affected facility subject to the SO2 emission limits under 40 CFR 60.42c shall install, calibrate, maintain, and operate a CEMS for measuring SO2 concentrations and either oxygen or carbon dioxide concentrations at the outlet of the SO2 control device (or the outlet of the steam generating unit if no SO2 control device is used), and shall record the output of the system. The percent reduction requirements under 40 CFR 60.42c do not apply and BAF is not required to measure SO2 concentrations and either oxygen or carbon dioxide concentrations at both the inlet and outlet of the SO2 control device.

In accordance with 40 CFR 60.46c(b), the one-hour average SO2 emission rates measured by a CEMS shall be expressed in ng/J or lb/million Btu heat input and shall be used to calculate the average emission rates under 40 CFR 60.42c. Each one-hour average SO2 emission rate must be based on at least 30 minutes of operation and include at least two data points representing two 15-minute periods. Hourly SO2 emission rates are not calculated if the affected facility is operated less than 30 minutes in a one-hour period and are not counted toward determination of a steam generating unit operating day.

In accordance with 40 CFR 60.46c(c), the procedures under 40 CFR 60.13 shall be followed for installation, evaluation, and operation of the CEMS:

- All CEMS shall be operated in accordance with the applicable procedures under Performance Specifications 1, 2, and 3 (40 CFR Part 60 Appendix B).
- Quarterly accuracy determinations and daily calibration drift tests shall be performed in accordance with Procedure 1 (40 CFR Part 60 Appendix F).
- 40 CFR 60.46c(c)(3) does not apply
- The span value of the SO2 CEMS at the outlet from the SO2 control device (or outlet of the steam generating unit if no SO2 control device is used) shall be 125% of the maximum estimated hourly potential SO2 emission rate of the fuel combusted.

As an alternative to operating an SO2 CEMS, fuel sampling may be conducted in accordance with 40 CFR 60.46c(d).

In accordance with 40 CFR 60.46c(f), the owner or operator of an affected facility operating a CEMS pursuant to 40 CFR 60.46c(a), or conducting as-fired fuel sampling pursuant to 40 CFR 60.46c(d)(1), shall obtain emission data for at least 75% of the operating hours in at least 22 out of 30 successive steam generating unit operating days. If this minimum data requirement is not met with a single monitoring system, the owner

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or operator of the affected facility shall supplement the emission data with data collected with other monitoring systems as approved by the EPA Administrator.

In accordance with 40 CFR 60.13(c), all data are to be reduced to 1-hour averages for any 60-minute period commencing on the hour and in accordance with 40 CFR 60.13(h).

Enforceability

Federally Enforceable

Applicable Monitoring, Recordkeeping and Reporting Requirements

40 CFR 60.7(f)

40 CFR 60.48c(e); PTC No. P-050301, Condition 5.1.5

40 CFR 60.48c(j); PTC No. P-050301, Condition 5.1.6

Evaluation of Current Compliance

In Compliance Now?

Yes

Basis for Determining Current Compliance Status:

Review of data recorded by CEMS. Fuel sampling is not conducted.

Continuing Compliance Demonstration

Continuing Compliance Certification

This emissions unit will continue to comply with this applicable requirement.

Methods of Demonstrating Continuing Compliance

Continuing compliance will be demonstrated from review of data recorded by CEMS. If fuel sampling is conducted in the future to demonstrate compliance with sulfur dioxide emission limits in lieu of a CEMS, continuing compliance will be demonstrated from fuel sampling records.

Reporting Methods and Frequencies

Monitoring data reports will be submitted every six months, in accordance with provisions of the Tier I permit (IDAPA 58.01.01.322.08.c).

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BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I Permit Compliance Report will either certify compliance with this requirement, or if compliance cannot be certified, will provide an appropriate compliance schedule.

Performance Testing - SO₂

40 CFR 60.44c; PTC No. P-050301, Sec 4.2

Except as provided in paragraphs 40 CFR 60.44c(g) and (h) and in 60.8(b), performance tests [for SO₂ emissions] required under 40 CFR 60.8 shall be conducted following the procedures specified in 40 CFR 60.44c(b), (c), (d), and (e), as applicable. Section 60.8(f) does not apply to this section. The 30-day notice required in 40 CFR 60.8(d) applies only to the initial performance test unless otherwise specified by the EPA Administrator in accordance with 40 CFR 60.44c(a).

The initial performance test required under 40 CFR 60.8 shall be conducted over 30 consecutive operating days of the steam generating unit. Compliance with the SO₂ emission limits under 40 CFR 60.42c shall be determined using a 30-day average. The first operating day included in the initial performance test shall be scheduled within 30 days after achieving the maximum production rate at which Boiler 2 will be operated, but not later than 180 days after the initial startup of the Boiler 2. The steam generating unit load during the 30-day period does not have to be the maximum design heat input capacity, but must be representative of future operating conditions in accordance with 40 CFR 60.44c(b).

After the initial performance test required under paragraph 40 CFR 60.44c(b) and 60.8, compliance with the SO₂ emission limits under 40 CFR 60.42c is based on the average SO₂ emission rates for 30 consecutive steam generating unit operating days. A separate performance test is completed at the end of each steam generating unit operating day, and a new 30-day average SO₂ emission rate is calculated to show compliance with the standard in accordance with 40 CFR 60.44c(c). If only oil is combusted in Boiler 2, the procedures in Method 19 are used to determine the hourly SO₂ emission rate (E_{ho}) and the 30-day average SO₂ emission rate (E_{ao}). The hourly averages used to compute the 30-day averages are obtained from the continuous emission monitoring system (CEMS). Method 19 shall be used to calculate E_{ao} when using daily fuel sampling or Method 6B in accordance with 40 CFR 60.44c(d).

In accordance with 40 CFR 60.44c(g), for oil-fired affected facilities where the owner or operator seeks to demonstrate compliance with the fuel oil sulfur limits under 40 CFR 60.42c based on shipment fuel sampling, the initial performance test shall consist of sampling and analyzing the oil in the initial tank of oil to be fired in the steam generating unit to demonstrate that the oil contains 0.5 weight percent sulfur or less. Thereafter, the owner or operator of the affected facility shall sample the oil in the fuel tank after each new shipment of oil is received, as described under 40 CFR 60.46c(d)(2).

In accordance with 40 CFR 60.44c(j), the owner or operator of an affected facility shall use all valid SO₂ emissions data in calculating E_{ho} under 40 CFR 60.44c(d) or (e), as

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applicable, whether or not the minimum emissions data requirements under 40 CFR 60.46c(f) are achieved. All valid emissions data, including valid data collected during periods of startup, shutdown, and malfunction, shall be used in calculating Eho pursuant to 40 CFR 60.44c(d) or (e), as applicable.

Enforceability

Federally Enforceable

Applicable Monitoring, Recordkeeping and Reporting Requirements

40 CFR 60.7(f)

40 CFR 60.48c(b); PTC No. P-050301, Condition 5.1.2

40 CFR 60.48c(e); PTC No. P-050301, Condition 5.1.5

40 CFR 60.48c(j); PTC No. P-050301, Condition 5.1.6

Evaluation of Current Compliance

In Compliance Now?

Yes

Basis for Determining Current Compliance Status:

Boiler 2 has combusted fuel oil only for purposes of start-up and initial performance testing and has not combusted oil for 30 consecutive days. Therefore, the 30 consecutive day performance test requirement is not applicable. The initial performance test demonstrated compliance with sulfur dioxide emission limit.

On June 6 and 8, 2006 BAF completed an initial Relative Accuracy Test Audit (RATA) of the SO₂ CEMS. Due to operational difficulties with Boiler 2, this initial RATA could not be completed within 180 days after initial start-up with #6 oil. BAF received approval from EPA for an extension of time to complete the initial RATA.

Continuing Compliance Demonstration

Continuing Compliance Certification

This emissions unit will continue to comply with this applicable requirement.

Methods of Demonstrating Continuing Compliance

Continuing compliance will be demonstrated from review of data recorded by CEMS. If fuel sampling is conducted in the future to demonstrate compliance with

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sulfur dioxide emission limits in lieu of a CEMS, continuing compliance will be demonstrated from fuel sampling records.

Reporting Methods and Frequencies

Monitoring data reports will be submitted every six months, in accordance with provisions of the Tier I permit (IDAPA 58.01.01.322.08.c.

BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I Permit Compliance Report will either certify compliance with this requirement, or if compliance cannot be certified, will provide an appropriate compliance schedule.

Performance Testing - PM

IDAPA 58.01.01.157; PTC No. P-050301, Sec 4.8

Within 60 days of achieving the maximum production rate of Boiler 2 when firing No. 6 fuel oil, but not later than 180 days after issuance of this permit, an initial performance test shall be conducted to measure PM emissions from the stack of Boiler 2, when firing No. 6 fuel oil, to demonstrate compliance with the PM emission limit in Permit Condition 3.7. The test shall be conducted in accordance with the procedures specified in Permit Condition 3.24

40 CFR 60.45c(a)

The owner or operator of an affected facility subject to the PM ... standards under § 60.43c shall conduct an initial performance test as required under § 60.8, and shall conduct subsequent performance tests as requested by the Administrator, to determine compliance with the standards using the following procedures and reference methods.

See 40 CFR 60.45c(a) for performance test requirements.

Enforceability

Federally Enforceable

Applicable Monitoring, Recordkeeping and Reporting Requirements

40 CFR 60.7(f)

40 CFR 60.7(a)(5)

IDAPA 58.01.01.157

PTC No. P-050301, Conditions 5.2 and 5.3

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Evaluation of Current Compliance

In Compliance Now?

Yes

Basis for Determining Current Compliance Status:

A PM performance test was completed June 6 and 8, 2006. On June 6 and 8, 2006 BAF completed an initial PM performance test for Boiler 2. Due to operational difficulties with Boiler 2, this initial RATA could not be completed within 180 days after initial start-up with #6 oil. BAF received approval from EPA for an extension of time to complete this initial performance test.

Continuing Compliance Demonstration

Continuing Compliance Certification

This emissions unit will continue to comply with this applicable requirement.

Methods of Demonstrating Continuing Compliance

Continuing compliance will be demonstrated from review of PM performance testing records

Reporting Methods and Frequencies

For future performance evaluation reports, two copies of a written performance evaluation report will be submitted to EPA within 60 days of completion of the performance evaluation. If any future performance evaluations are completed, a summary of the test results will be included in the semi-annual monitoring data, in accordance with provisions of the Tier I permit (IDAPA 58.01.01.322.08.c).

BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I Permit Compliance Report will either certify compliance with this requirement, or if compliance cannot be certified, will provide an appropriate compliance schedule.

Scrubber Liquid Flow Rate

NSPS Subpart Dc Alternative to COMS for Boiler Re-firing Project at Blackfoot, Idaho (approved by EPA Region X, 29 Sep 2005), Provision 4

Basic American Foods shall continuously monitor the scrubbing liquid flow rate and the pressure drop of the gas stream across the scrubber serving Boiler 2 whenever Boiler 2

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combusts fuel oil. Once per hour, Basic American Foods shall record the hourly average scrubbing liquid flowrate and pressure drop of the gas stream. Note that Boiler 1 is not subject to the NSPS; therefore, this requirement does not apply to Boiler 1, except when Boiler 1 operates simultaneously with Boiler 2.

Enforceability

Federally Enforceable

Applicable Monitoring, Recordkeeping and Reporting Requirements

Contained in requirement.

Evaluation of Current Compliance

In Compliance Now?

Yes

Basis for Determining Current Compliance Status:

A review of scrubber operating data confirms that scrubber liquid flow rate and scrubber pressure drop are monitored continuously and averaged hourly when the scrubber is operating.

Continuing Compliance Demonstration

Continuing Compliance Certification

This emissions unit will continue to comply with this applicable requirement.

Methods of Demonstrating Continuing Compliance

Review of scrubber operating data.

Reporting Methods and Frequencies

Monitoring data reports will be submitted every six months, in accordance with provisions of the Tier I permit (IDAPA 58.01.01.322.08.c).

BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I Permit Compliance Report will either certify compliance with this requirement, or if compliance cannot be certified, will provide an appropriate compliance schedule.

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RECORDKEEPING REQUIREMENTS – BOILER 2

The following recordkeeping requirements apply to Boiler 2.

Recordkeeping - NSPS Requirements

40 CFR 60.7(f); 40 CFR 60.48c(i); PTC No. P-050301, Condition 4.10.2

Any owner or operator subject to the provisions of 40 CFR Part 60 shall maintain a file of all measurements, including continuous monitoring system, monitoring device, and performance testing measurements; all continuous monitoring system performance evaluations; all continuous monitoring system or monitoring device calibration checks; adjustments and maintenance performed on these systems or devices; and all other information required by this part recorded in a permanent form suitable for inspection. The file shall be retained for at least two years following the date of such measurements, maintenance, reports, and records.

All records required under 40 CFR 60.48c shall be maintained by the owner or operator of the affected facility for a period of two years following the date of such record in accordance with 40 CFR 60.48c(i).

Enforceability

Federally Enforceable

Applicable Monitoring, Recordkeeping and Reporting Requirements

None

Evaluation of Current Compliance

In Compliance Now?

Yes

Basis for Determining Current Compliance Status:

Inspection of records

Continuing Compliance Demonstration

Continuing Compliance Certification

This emissions unit will continue to comply with this applicable requirement.

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Methods of Demonstrating Continuing Compliance

Continuing compliance will be demonstrated by inspecting available records.

Reporting Methods and Frequencies

BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I Permit Compliance Report will either certify compliance with this requirement, or if compliance cannot be certified, will provide an appropriate compliance schedule.

Fuel Usage Records

40 CFR 60.48c(g); PTC No. P-050301, Condition 4.10.1

The owner or operator shall record and maintain records of the amounts of each fuel combusted during each day in accordance with 40 CFR 60.48c(g).

Enforceability

Federally Enforceable

Applicable Monitoring, Recordkeeping and Reporting Requirements

None

Evaluation of Current Compliance

In Compliance Now?

Yes

Basis for Determining Current Compliance Status:

Inspection of records

Continuing Compliance Demonstration

Continuing Compliance Certification

This emissions unit will continue to comply with this applicable requirement.

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Methods of Demonstrating Continuing Compliance

Continuing compliance will be demonstrated by inspecting available records.

Reporting Methods and Frequencies

BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I Permit Compliance Report will either certify compliance with this requirement, or if compliance cannot be certified, will provide an appropriate compliance schedule.

Performance Testing Records

40 CFR 60.11(e)

Except as provided in 40 CFR 60.11(e)(3), the owner or operator of an affected facility to which an opacity standard in this part applies shall record the opacity of emissions during opacity observations conducted in accordance with 40 CFR 60.11(b).

Enforceability

Federally Enforceable

Applicable Monitoring, Recordkeeping and Reporting Requirements

None

Evaluation of Current Compliance

In Compliance Now?

Yes

Basis for Determining Current Compliance Status:

Inspection of records

Continuing Compliance Demonstration

Continuing Compliance Certification

This emissions unit will continue to comply with this applicable requirement.

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Methods of Demonstrating Continuing Compliance

Continuing compliance will be demonstrated by inspecting available records.

Reporting Methods and Frequencies

BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I Permit Compliance Report will either certify compliance with this requirement, or if compliance cannot be certified, will provide an appropriate compliance schedule.

Startup, Shutdown, and Malfunction Records

40 CFR 60.7(b)

Any owner or operator subject to the provisions of 40 CFR Part 60 shall maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility; any malfunction of the air pollution control equipment; or any periods during which a continuous monitoring system or monitoring device is inoperative.

Enforceability

Federally Enforceable

Applicable Monitoring, Recordkeeping and Reporting Requirements

None

Evaluation of Current Compliance

In Compliance Now?

Yes

Basis for Determining Current Compliance Status:

Inspection of records

Continuing Compliance Demonstration

Continuing Compliance Certification

This emissions unit will continue to comply with this applicable requirement.

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Methods of Demonstrating Continuing Compliance

Continuing compliance will be demonstrated by inspecting available records.

Reporting Methods and Frequencies

BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I Permit Compliance Report will either certify compliance with this requirement, or if compliance cannot be certified, will provide an appropriate compliance schedule.

Wet Scrubber Monitoring Instrumentation Calibration Records

NSPS Subpart Dc Alternative to COMS for Boiler Re-firing Project at Blackfoot, Idaho (approved by EPA Region X, 29 Sep 2005), Provision 2

Each calibration for each piece of equipment [used to monitor wet scrubber operation pursuant to NSPS Subpart Dc Alternative to COMS for Boiler Re-firing Project at Blackfoot, Idaho (approved by EPA Region X, 29 Sep 2005), Provision 1] shall be recorded and available for inspection in accordance with the terms of the permit. The facility noted that the equipment may be self-calibrating. In this case, manufacturer's documentation of the self-calibration will be required to be kept on site and available for inspection.

Enforceability

Federally Enforceable

Applicable Monitoring, Recordkeeping and Reporting Requirements

None

Evaluation of Current Compliance

In Compliance Now?

Yes

Basis for Determining Current Compliance Status:

Review of scrubber operating records confirms that the required calibration records are being maintained.

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Continuing Compliance Demonstration

Continuing Compliance Certification

This emissions unit will continue to comply with this applicable requirement.

Methods of Demonstrating Continuing Compliance

Review of scrubber operating records.

Reporting Methods and Frequencies

BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I Permit Compliance Report will either certify compliance with this requirement, or if compliance cannot be certified, will provide an appropriate compliance schedule.

REPORTING REQUIREMENTS – BOILER 2

The following reporting requirements apply to Boiler 2.

Notification of Boiler Construction and Startup

40 CFR 60.7(a), (g); 40 CFR 60.48c(a); PTC No. P-050301, Condition 5.1.1

In accordance with 40 CFR 60.48c(a), BAF shall submit notification of the date of construction or reconstruction, anticipated startup, and actual startup, as provided by 40 CFR 60.7. This notification shall include:

- The design heat input capacity of Boiler 2 and identification of fuels to be combusted in Boiler 2.
- If applicable, a copy of any Federally enforceable requirement that limits the annual capacity factor for any fuel or mixture of fuels under 40 CFR 60.42c or 60.43c.
- The annual capacity factor at which the owner or operator anticipates operating Boiler 2 based on all fuels fired and based on each individual fuel fired.
- Notification if an emerging technology will be used for controlling SO₂ emissions as described in 40 CFR 60.48c(a)(4).

If notification substantially similar to that of 40 CFR 60.7(a) is required by any other State or local agency, sending the Administrator a copy of that notification will satisfy the requirements of 40 CFR 60.7(a) of this section.

Enforceability

Federally Enforceable

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Applicable Monitoring, Recordkeeping and Reporting Requirements

None

Evaluation of Current Compliance

In Compliance Now?

Yes

Basis for Determining Current Compliance Status:

Inspection of correspondence records.

Continuing Compliance Demonstration

Continuing Compliance Certification

This emissions unit will continue to comply with this applicable requirement.

Methods of Demonstrating Continuing Compliance

Continuing compliance will be demonstrated by inspecting available correspondence records.

Reporting Methods and Frequencies

BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I Permit Compliance Report will either certify compliance with this requirement, or if compliance cannot be certified, will provide an appropriate compliance schedule.

**Notification of Date Upon Which Demonstration of Continuous Monitoring
System Performance Commences**

40 CFR 60.7(a)(5)

Any owner or operator subject to the provisions of 40 CFR Part 60 shall furnish the Administrator with written notification of the date upon which demonstration of the continuous monitoring system performance commences in accordance with § 60.13(c). Notification shall be postmarked not less than 30 days prior to such date.

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Enforceability

Federally Enforceable

Applicable Monitoring, Recordkeeping and Reporting Requirements

None

Evaluation of Current Compliance

In Compliance Now?

Yes

Basis for Determining Current Compliance Status:

Compliance is determined from BAF correspondence records. BAF notified EPA on March 7, 2006 that performance testing of Boiler 2 would commence on April 5, 2006. Note that due to operating problems with Boiler 2, the performance testing was rescheduled to June 6 and 8, 2006. EPA approved an extension of time to complete this test.

Continuing Compliance Demonstration

Continuing Compliance Certification

This emissions unit will continue to comply with this applicable requirement.

Methods of Demonstrating Continuing Compliance

Continuing compliance will be demonstrated by inspecting available correspondence records.

Reporting Methods and Frequencies

BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I Permit Compliance Report will either certify compliance with this requirement, or if compliance cannot be certified, will provide an appropriate compliance schedule.

Excess Emissions and Monitoring Systems Performance Reports

40 CFR 60.7(c)

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Each owner or operator required to install a continuous monitoring device shall submit excess emissions and monitoring systems performance report and/or summary report form as required by 40 CFR 60.7(c)

Enforceability

Federally Enforceable

Applicable Monitoring, Recordkeeping and Reporting Requirements

None

Evaluation of Current Compliance

In Compliance Now?

Yes

Basis for Determining Current Compliance Status:

The continuous monitoring system for Boiler 2 has not been operating sufficiently long to require that a performance report be submitted

Continuing Compliance Demonstration

Continuing Compliance Certification

This emissions unit will continue to comply with this applicable requirement.

Methods of Demonstrating Continuing Compliance

Continuing compliance will be demonstrated by inspecting available correspondence records.

Reporting Methods and Frequencies

BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I Permit Compliance Report will either certify compliance with this requirement, or if compliance cannot be certified, will provide an appropriate compliance schedule.

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**Notification of Anticipated Date for Conducting Opacity Performance
Testing**

40 CFR 60.7(a)(6)

Any owner or operator subject to the provisions of 40 CFR Part 60 shall furnish the Administrator with written notification of the anticipated date for conducting the opacity observations required by § 60.11(e)(1) of this part. The notification shall also include, if appropriate, a request for the Administrator to provide a visible emissions reader during a performance test. The notification shall be postmarked not less than 30 days prior to such date.

Enforceability

Federally Enforceable

Applicable Monitoring, Recordkeeping and Reporting Requirements

None

Evaluation of Current Compliance

In Compliance Now?

Yes

Basis for Determining Current Compliance Status:

Inspection of correspondence records.

Continuing Compliance Demonstration

Continuing Compliance Certification

This emissions unit will continue to comply with this applicable requirement.

Methods of Demonstrating Continuing Compliance

Continuing compliance will be demonstrated by inspecting available correspondence records.

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Reporting Methods and Frequencies

BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I Permit Compliance Report will either certify compliance with this requirement, or if compliance cannot be certified, will provide an appropriate compliance schedule.

Excess Emissions Reporting

40 CFR 60.7(c); 40 CFR 60.48c(c); PTC No. P-050301, Condition 5.1.3

In accordance with 40 CFR 60.48c(c), the owner or operator of each residual oil-fired affected facility subject to the opacity limits under 40 CFR 60.43c(c) shall submit excess emission reports for any excess emissions from the affected facility which occur during the reporting period.

Enforceability

Federally Enforceable

Applicable Monitoring, Recordkeeping and Reporting Requirements

None

Evaluation of Current Compliance

In Compliance Now?

Yes

Basis for Determining Current Compliance Status:

Inspection of correspondence records.

Continuing Compliance Demonstration

Continuing Compliance Certification

This emissions unit will continue to comply with this applicable requirement.

Methods of Demonstrating Continuing Compliance

Continuing compliance will be demonstrated by inspecting available correspondence records.

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Reporting Methods and Frequencies

BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I Permit Compliance Report will either certify compliance with this requirement, or if compliance cannot be certified, will provide an appropriate compliance schedule.

Performance Test Reports

40 CFR 60.11(e)

Except as provided in 40 CFR 60.11(e)(3), the owner or operator of an affected facility to which an opacity standard in this part applies shall report to the Administrator the opacity results along with the results of the initial performance test required under 40 CFR 60.8.

40 CFR 60.13(c)(2)

The owner or operator of an affected facility shall furnish the Administrator within 60 days of completion two or, upon request, more copies of a written report of the results of the performance evaluation.

40 CFR 60.48c(b); PTC No. P-050301, Condition 5.1.2

In accordance with 40 CFR 60.48c(b), the owner or operator of each affected facility subject to the SO₂ emission limits of 40 CFR 60.42c, or the opacity limits of 40 CFR 60.43c, shall submit to the EPA Administrator the performance test data from the initial and any subsequent performance tests and, if applicable, the performance evaluation of the CEMS and/or COMS using the applicable performance specifications in 40 CFR 60 Appendix B.

Enforceability

Federally Enforceable

Applicable Monitoring, Recordkeeping and Reporting Requirements

None

Evaluation of Current Compliance

In Compliance Now?

Yes

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Basis for Determining Current Compliance Status:

Initial performance tests of Boiler 2 were conducted on June 6 and 8, 2006. BAF is awaiting results of this performance test. The 60-day period to report these results has not yet elapsed.

Continuing Compliance Demonstration

Continuing Compliance Certification

This emissions unit will continue to comply with this applicable requirement.

Methods of Demonstrating Continuing Compliance

Continuing compliance will be demonstrated by inspecting available correspondence records.

Reporting Methods and Frequencies

BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I Permit Compliance Report will either certify compliance with this requirement, or if compliance cannot be certified, will provide an appropriate compliance schedule.

SO₂ Emissions Reports

40 CFR 60.48c(d), (e), and (j); PTC No. P-050301, Conditions 5.1.4, 5.1.5, and 5.1.6

The owner or operator of each affected facility subject to the SO₂ emission limits or fuel oil sulfur limits under 40 CFR 60.42c shall keep records and submit reports to the EPA Administrator, including the following information, as applicable:

- Calendar dates covered in the reporting period.
- Each 30-day average SO₂ emission rate (ng/J or lb/million Btu), or 30-day average sulfur content (weight percent), calculated during the reporting period, ending with the last 30-day period; reasons for any noncompliance with the emission standards; and a description of corrective actions taken.
- 40 CFR 60.48c(e)(3) does not apply
- Identification of any steam generating unit operating days for which SO₂ or diluent (oxygen or carbon dioxide) data have not been obtained by an approved method for at least 75% of the operating hours; justification for not obtaining sufficient data; and a description of corrective actions taken.
- Identification of any times when emissions data have been excluded from the calculation of average emission rates; justification for excluding data; and a

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description of corrective actions taken if data have been excluded for periods other than those during which oil was not combusted in the steam generating unit.

- Identification of the F factor used in calculations, method of determination, and type of fuel combusted.
- Identification of whether averages have been obtained based on CEMS rather than manual sampling methods.
- If a CEMS is used, identification of any times when the pollutant concentration exceeded the full span of the CEMS.
- If a CEMS is used, description of any modifications to the CEMS that could affect the ability of the CEMS to comply with Performance Specifications 2 or 3 (40 CFR 60 Appendix B).
- If a CEMS is used, results of daily CEMS drift tests and quarterly accuracy assessments as required under 40 CFR 60 Appendix F, Procedure 1.

In accordance with 40 CFR 60.48c(j), the reporting period for the reports required under this subpart is each six-month period. All reports shall be submitted to the EPA Administrator and shall be postmarked by the 30th day following the end of the reporting period.

Enforceability

Federally Enforceable

Applicable Monitoring, Recordkeeping and Reporting Requirements

None

Evaluation of Current Compliance

In Compliance Now?

Yes

Basis for Determining Current Compliance Status:

The continuous monitoring system for Boiler 2 has not been operating sufficiently long to require that a performance report be submitted

Continuing Compliance Demonstration

Continuing Compliance Certification

This emissions unit will continue to comply with this applicable requirement.

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Methods of Demonstrating Continuing Compliance

Continuing compliance will be demonstrated by inspecting available correspondence records.

Reporting Methods and Frequencies

BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I Permit Compliance Report will either certify compliance with this requirement, or if compliance cannot be certified, will provide an appropriate compliance schedule.

BOILERS 1 AND 2

The discussion below identifies and presents compliance information on requirements that apply to Boilers 1 and 2 jointly or in tandem. Requirements that apply only to a specific boiler or that apply to Boilers 1, 2, and 3 jointly or collectively are discussed separately. Note that because Boiler 1 is not subject to 40 CFR 60 (the "NSPS"), applicable requirements that are based on NSPS do not apply to Boiler 1 except when Boiler 1 operates simultaneously with Boiler 2.

EMISSION LIMITS - BOILERS 1 AND 2

The following emission limits apply jointly or collectively to both Boiler 1 and Boiler 2.

PM10

PTC No. P-05030, Conditions 2.1 and 6

Combined emissions of PM10 from the exhaust stacks of Boilers 1 and 2 shall not exceed 5.7 lb/hr, as determined by a pollutant specific U.S. EPA reference method (or DEQ approved alternative), or as determined DEQ's emission estimation methods used in this permit analysis.

Enforceability

Federally Enforceable

Applicable Monitoring, Recordkeeping and Reporting Requirements

IDAPA 58.01.01.157; PTC No. P-050301, Condition 4.7

PTC No. P-050301, Condition 5.3

IDAPA 58.01.01.157

PTC No., P-050301, Condition 4.15

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Evaluation of Current Compliance

In Compliance Now?

Yes

Basis for Determining Current Compliance Status:

Compliance is based on engineering calculations of estimated emissions included in Appendices B and C. Initial performance tests of Boilers 1 and 2 were also conducted on June 5, 6, and 8, 2006. BAF is awaiting results of these performance tests.

Continuing Compliance Demonstration

Continuing Compliance Certification

This emissions unit will continue to comply with this applicable requirement.

Methods of Demonstrating Continuing Compliance

Continuing compliance will be demonstrated from future performance tests

Reporting Methods and Frequencies

Results from future performance tests will included in monitoring data reports for the six month period in which the performance test data become available (i.e., after receipt of the final performance test report)

BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I Permit Compliance Report will either certify compliance with this requirement, or if compliance cannot be certified, will provide an appropriate compliance schedule.

Sulfur Dioxide

PTC No. P-05030, Conditions 2.1 and 6

Combined emissions of sulfur dioxide from the exhaust stacks of Boilers 1 and 2 shall not exceed 45.3 lb/hr, as determined by a pollutant specific U.S. EPA reference method (or DEQ approved alternative), or as determined DEQ's emission estimation methods used in this permit analysis.

Enforceability

Federally Enforceable

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Applicable Monitoring, Recordkeeping and Reporting Requirements

PTC No. P-050301, Conditions 4.2, 4.4, 4.15, 5.1.5, 5.1.6, 5.2 5.3

Evaluation of Current Compliance

In Compliance Now?

Compliance is based on engineering calculations of estimated emissions included in Appendices B and C.

Sulfur dioxide emissions are also monitored by a Continuous Emissions Measurement System (CEMS) operated and installed in accordance with the requirements of 40 CFR 60, Subpart Dc. A Relative Accuracy Test Audit of the CEMS for Boiler 2 was conducted on June 6 and 8, 2006. BAF is awaiting results of this audit.

Basis for Determining Current Compliance Status:

Records of sulfur dioxide emissions from CEMS. Awaiting results of sulfur dioxide performance test and Relative Accuracy Test Analysis.

Continuing Compliance Demonstration

Continuing Compliance Certification

This emissions unit will continue to comply with this applicable requirement.

Methods of Demonstrating Continuing Compliance

Continuing compliance will be demonstrated from records of sulfur dioxide emissions from CEMS

Reporting Methods and Frequencies

Monitoring data reports will be submitted every six months, in accordance with provisions of the Tier I permit (IDAPA 58.01.01.322.08.c).

BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I Permit Compliance Report will either certify compliance with this requirement, or if compliance cannot be certified, will provide an appropriate compliance schedule.

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Nitrogen Oxides

PTC No. P-05030, Conditions 2.1 and 6

Combined emissions of nitrogen oxides from the exhaust stacks of Boilers 1 and 2 shall not exceed 61.9 lb/hr, as determined by a pollutant specific U.S. EPA reference method (or DEQ approved alternative), or as determined DEQ's emission estimation methods used in this permit analysis.

PTC No. P-05030, Conditions 2.1.1

Emissions of NOx from the exhaust stacks of Boilers 1 and 2 shall each not exceed 96.64 pounds per 1000 gallons when No.6 oil is combusted, as determined by a pollutant specific U.S. EPA reference method (or DEQ approved alternative), or as determined DEQ's emission estimation methods used in this permit analysis.

Enforceability

Federally Enforceable

Applicable Monitoring, Recordkeeping and Reporting Requirements

IDAPA 58.01.01.157; PTC No. P-050301, Condition 4.9

PTC No. P-050301, Condition 5.3

IDAPA 58.01.01.157

PTC No., P-050301, Condition 4.15

Evaluation of Current Compliance

In Compliance Now?

Yes (pending results of performance test)

Basis for Determining Current Compliance Status:

Nitrogen oxides performance test conducted June 5, 6, and 8, 2006

Continuing Compliance Demonstration

Continuing Compliance Certification

This emissions unit will continue to comply with this applicable requirement.

Methods of Demonstrating Continuing Compliance

Continuing compliance will be demonstrated from future performance tests

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Reporting Methods and Frequencies

Results from future performance tests will be included in monitoring data reports for the six month period in which the performance test data become available (i.e., after receipt of the final performance test report)

BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I Permit Compliance Report will either certify compliance with this requirement, or if compliance cannot be certified, will provide an appropriate compliance schedule.

Nickel

IDAPA 58.01.01.210.08 (6/30/95); PTC No. P-050301, Condition 2.6

Combined emissions of nickel from the exhaust stacks of Boilers 1 and 2 shall not exceed 240 pounds per any consecutive 12-month period, as determined by a pollutant specific U.S. EPA reference method (or DEQ approved alternative), or as determined DEQ's emission estimation methods used in this permit analysis.

Enforceability

Federally Enforceable

Applicable Monitoring, Recordkeeping and Reporting Requirements

None

Evaluation of Current Compliance

In Compliance Now?

Yes

Basis for Determining Current Compliance Status:

Compliance with the emission limit is based on emission calculation methods used by DEQ in the permit analysis, from operation of the wet scrubber, and from tuning of Boilers 1 and 2 in accordance with PTC No. P-050301, Condition 3.8. Tuning of the boilers helps ensure that the emission factors used to estimate emissions are still valid.

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Continuing Compliance Demonstration

Continuing Compliance Certification

This emissions unit will continue to comply with this applicable requirement.

Methods of Demonstrating Continuing Compliance

Compliance will be demonstrated by estimating emissions from boiler operating records (fuel usage or steam production), emission factors used in the permit analysis, and effective scrubber performance. Effective scrubber performance will be demonstrated by operating the scrubber in accordance with requirements of the NSPS Subpart Dc Alternative to COMS for Boiler Re-firing Project at Blackfoot, Idaho (approved by EPA Region X, 29 Sep 2005). Tuning of Boilers 1 and 2 in accordance with PTC No. P-050301, Condition 3.8 will help ensure that the emission factors used to estimate emissions are still valid.

Reporting Methods and Frequencies

BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I Permit Compliance Report will either certify compliance with this requirement, or if compliance cannot be certified, will provide an appropriate compliance schedule.

OPERATING REQUIREMENTS - BOILERS 1 AND 2

The following operating requirements apply to operation of Boilers 1 and 2.

Wet Scrubbing System – Boilers 1 and 2

PTC No. P-050301, Condition 3.5

The permittee shall install, maintain and operate a wet scrubbing system to control emissions of SO₂ and PM₁₀ from Boiler 1 and Boiler 2 as follows:

- Emissions of SO₂ and PM₁₀ from Boiler 1 shall be controlled using a wet scrubber when fuel oil is combusted. When Boiler 1 combusts natural gas, wet scrubbing of the Boiler 1 exhaust is not required.
- Emissions of SO₂ and PM₁₀ from Boiler 2 shall be controlled using a wet scrubber when fuel oil is combusted. When Boiler 2 combusts natural gas, wet scrubbing of the Boiler 2 exhaust is not required.
- When Boiler 2 combusts distillate or residual oil, Boiler 2 shall exhaust through the stack that serves Boiler 1. When Boiler 2 combusts natural gas, Boiler 2 may exhaust through its own stack.

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Enforceability

Federally Enforceable

Applicable Monitoring, Recordkeeping and Reporting Requirements

None

Evaluation of Current Compliance

In Compliance Now?

Yes

Basis for Determining Current Compliance Status:

Boiler and scrubber operations and records verify that since completion and startup of the refiring project authorized by PTC No. P-050301, the exhausts from Boilers 1 and 2 have been merged at all times when fuel oil is combusted in Boiler 2, and the wet scrubber has operated any time fuel oil was combusted in either Boiler 1 or Boiler 2.

Continuing Compliance Demonstration

Continuing Compliance Certification

This emissions unit will continue to comply with this applicable requirement.

Methods of Demonstrating Continuing Compliance

Continuing compliance will be demonstrated from records of boiler operation, fuel usage, and scrubber operation. Using these records, BAF will verify that:

At all times when fuel oil was combusted in Boiler 2, the Boiler 2 exhaust was merged with the Boiler 1 exhaust.

At all times when fuel oil was combusted in either Boiler 1 or Boiler 2, the wet scrubber was in operation (except during periods of malfunction).

Reporting Methods and Frequencies

BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I Permit Compliance Report will either certify compliance with this requirement, or if compliance cannot be certified, will provide an appropriate compliance schedule.

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Wet Scrubbing System – Boilers 1 and 2

PTC No. P-050301, Condition 3.6

The permittee shall install, calibrate, operate and maintain equipment to measure each of the following operating parameters for the wet scrubbing system. When the wet scrubbing system is required to be operated, each operating parameter shall be maintained within the specifications established in the O&M manual:

- Pressure drop across the scrubber, or DEQ-approved alternative monitoring, for ensuring dispersion and mixing of scrubbing solution with air;
- Scrubbing solution pH; and
- Scrubbing solution flow rate.

Enforceability

Federally Enforceable

Applicable Monitoring, Recordkeeping and Reporting Requirements

PTC No., P-050301, Condition 4.16

Evaluation of Current Compliance

In Compliance Now?

Yes

Basis for Determining Current Compliance Status:

Review of scrubber system monitoring records boiler fuel consumption and steam production records.

Continuing Compliance Demonstration

Continuing Compliance Certification

This emissions unit will continue to comply with this applicable requirement.

Methods of Demonstrating Continuing Compliance

Continuing compliance will be demonstrated from review of scrubber system monitoring records.

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Reporting Methods and Frequencies

Monitoring data reports will be submitted every six months, in accordance with provisions of the Tier I permit (IDAPA 58.01.01.322.08.c).

BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I Permit Compliance Report will either certify compliance with this requirement, or if compliance cannot be certified, will provide an appropriate compliance schedule.

Wet Scrubbing System – Boilers 1 and 2

PTC No. P-050301, Condition 3.7

NSPS Subpart Dc Alternative to COMS for Boiler Re-firing Project at Blackfoot, Idaho (approved by EPA Region X, 29 Sep 2005), Provision 9

Within 60 days after startup of the wet scrubbing systems, the permittee shall have developed an O&M manual for the wet scrubbing system, which describes the procedures that will be followed to comply with the PTC General Provisions and the manufacturer specifications for the air pollution control device. At a minimum the following items shall be addressed in the manual:

- The manufacturer's recommended minimum and maximum values, or DEQ-approved alternatives, for each of the following operating parameters: pressure drop, for ensuring dispersion and mixing of the scrubbing solution with the air stream; the scrubbing solution pH; and the scrubbing solution flow rate.
- Inspection checklists for items that will be periodically inspected while the treatment system is operating, including frequency of inspection.
- Inspection checklist for items that will be inspected when the device is taken out of operation and physically opened for inspection (e.g., internal components), including frequency of these internal inspections.
- Periodic planned maintenance for the control devices.

The contents of the O&M manual shall be based on manufacturer's information to the extent practical. When the manufacturer's information is not used (e.g., a DEQ-approved alternative or performance test information is used in lieu of manufacturer information), this shall be explained in the manual. The O&M manual shall remain onsite at all times and shall be made available to DEQ representatives upon request.

Enforceability

Federally Enforceable

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Applicable Monitoring, Recordkeeping and Reporting Requirements

None

Evaluation of Current Compliance

In Compliance Now?

Yes

Basis for Determining Current Compliance Status:

Verification that an O&M Manual has been prepared that meets the provisions of this requirement and that the manual is available on-site and can be accessed if requested.

Continuing Compliance Demonstration

Continuing Compliance Certification

This emissions unit will continue to comply with this applicable requirement.

Methods of Demonstrating Continuing Compliance

Continuing compliance will be demonstrated by verifying that the O&M Manual is available on site and has been updated as necessary.

Reporting Methods and Frequencies

BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I Permit Compliance Report will either certify compliance with this requirement, or if compliance cannot be certified, will provide an appropriate compliance schedule.

Residual Oil Throughput – Boilers 1 and 2

PTC No. P-050301, Condition 3.3

The combined quantity of residual oil combusted in Boiler 1 and Boiler 2 shall not exceed 15,384 gallons per day and 4,097,682 gallons per year, based on any consecutive 12-month period.

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Enforceability

Federally Enforceable

Applicable Monitoring, Recordkeeping and Reporting Requirements

40 CFR 60.48c(g); PTC No. P-050301, Condition 4.10.1
PTC No. P-050301, Condition 4.12

Evaluation of Current Compliance

In Compliance Now?

Yes

Basis for Determining Current Compliance Status:

Review of daily fuel combustion records.

Continuing Compliance Demonstration

Continuing Compliance Certification

This emissions unit will continue to comply with this applicable requirement.

Methods of Demonstrating Continuing Compliance

Continuing compliance will be demonstrated from review of monthly summaries of daily fuel combustion records.

Reporting Methods and Frequencies

Monitoring data reports will be submitted every six months, in accordance with provisions of the Tier I permit (IDAPA 58.01.01.322.08.c).

BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I Permit Compliance Report will either certify compliance with this requirement, or if compliance cannot be certified, will provide an appropriate compliance schedule.

MONITORING REQUIREMENTS - BOILERS 1 AND 2

The following monitoring requirements apply collectively or jointly to Boilers 1 and 2.

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Emission Monitoring

40 CFR 64.2; PTC No. P-050301, Condition 4.6

Whenever oil is combusted in Boiler 1, opacity from the Boiler 1 stack shall be monitored by complying with the opacity requirements described in the 40 CFR Part 60 (NSPS) requirements for Boiler 2 as described in Section 3 of permit PTC No. P-050301. (Pursuant to 40 CFR 60.13(i), an alternative opacity monitoring plan has been approved by US EPA.)

Whenever oil is combusted in Boiler 1 or Boiler 2, SO₂ emissions from the Boiler(s) shall be monitored by complying with the SO₂ CEMS or fuel sampling requirements as described in the 40 CFR Part 60 (NSPS) requirements for Boiler 2, as described in Section 3 of permit PTC No. P-050301, for purposes of complying with the Compliance Assurance Monitoring (CAM) exemption requirements under 40 CFR 64.2(b)(1)(vi). Maintaining records of fuel receipts for fuel oil may not be used for this purpose.

Enforceability

Federally Enforceable

Applicable Monitoring, Recordkeeping and Reporting Requirements

40 CFR 60.7(f)

40 CFR 60.48c(i); PTC No. P-050301, Condition 4.10.2

40 CFR 60.48c(d); PTC No. P-050301, Condition 5.1.4

40 CFR 60.48c(e); PTC No. P-050301, Condition 5.1.5

NSPS Subpart Dc Alternative to COMS for Boiler Re-firing Project at Blackfoot, Idaho (approved by EPA Region X, 29 Sep 2005), Provision 4

Evaluation of Current Compliance

In Compliance Now?

Yes

Basis for Determining Current Compliance Status:

Review of records from sulfur dioxide CEMS and scrubber operating records maintained in accordance with approved alternate opacity monitoring plan.

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Continuing Compliance Demonstration

Continuing Compliance Certification

This emissions unit will continue to comply with this applicable requirement.

Methods of Demonstrating Continuing Compliance

Review of records from sulfur dioxide CEMS and scrubber operating records maintained in accordance with approved alternate opacity monitoring plan. If fuel supply sampling is used for sulfur dioxide performance evaluation, then the sampling results will be used to demonstrate compliance with this requirement.

Reporting Methods and Frequencies

Monitoring data reports will be submitted every six months, in accordance with provisions of the Tier I permit (IDAPA 58.01.01.322.08.c).

BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I Permit Compliance Report will either certify compliance with this requirement, or if compliance cannot be certified, will provide an appropriate compliance schedule.

Performance Testing - PM

IDAPA 58.01.01.157; PTC No. P-050301, Condition 4.7

At least once every five years a PM performance test shall be conducted on the stack of Boiler 1 and Boiler 2, when firing No. 6 fuel oil, to demonstrate compliance with the PM emission limit in Permit Condition 3.7. Each boiler shall be tested while operating alone and each may be tested on a different date so long as each boiler is tested no less than once every five years. The test shall be conducted in accordance with the procedures outlined in 40 CFR 60, Appendix A, Method 5, or a DEQ-approved alternative. The performance test shall be performed in accordance with IDAPA 58.01.01.157 and the following requirements:

- The boiler shall be operated at the worst case normal production rate during the performance test. A description of how this requirement was met shall be included in the performance test report.
- Visible emissions shall be observed during each performance test run using the methods specified in IDAPA 58.01.01.625.
- The quantity of fuel oil combusted by the boiler during the test shall be recorded in units of gallons per hour.

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Enforceability

Federally Enforceable

Applicable Monitoring, Recordkeeping and Reporting Requirements

IDAPA 58.01.01.157

PTC No. P-050301, Condition 5.3

Evaluation of Current Compliance

In Compliance Now?

Yes

Basis for Determining Current Compliance Status:

PM performance test of Boilers 1 and 2 while combusting #6 oil were completed June 5, 6, and 8, 2006.

Continuing Compliance Demonstration

Continuing Compliance Certification

This emissions unit will continue to comply with this applicable requirement.

Methods of Demonstrating Continuing Compliance

Continuing compliance will be demonstrated from review of PM performance testing records

Reporting Methods and Frequencies

For future performance evaluation reports, performance test reports will be submitted in accordance with IDAPA 58.01.01.157 and PTC No. P-050301, Condition 5.3. If any future performance evaluations are completed, a summary of the test results will be included in the semi-annual monitoring data, in accordance with provisions of the Tier I permit (IDAPA 58.01.01.322.08.c.)

BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I Permit Compliance Report will either certify compliance with this requirement, or if compliance cannot be certified, will provide an appropriate compliance schedule.

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Performance Testing - NOx

IDAPA 58.01.01.157, 4/5/00; PTC No. P-050301, Condition 4.9

Within 60 days of achieving the maximum production rate of Boiler 1 and Boiler 2 when firing No. 6 fuel oil, but not later than 180 days after issuance of this permit, and at least once every five years thereafter, performance tests shall be conducted to measure NOx emissions from the stacks of Boiler 1 and Boiler 2, when firing No. 6 fuel oil, to demonstrate compliance with the pound per hour NOx emission limits in Permit Condition 3.1. Each boiler shall be tested while operating alone and each may be tested on a different date so long as each boiler is tested no less than once every five years. The tests shall be conducted in accordance with the procedures outlined in 40 CFR 60, Appendix A, Method 7E, or a DEQ-approved alternative. Each performance test shall be performed in accordance with IDAPA 58.01.01.157 and the following requirements:

The boiler shall be operated at the worst case normal production rate during the performance test. A description of how this requirement was met shall be included in the performance test report.

Visible emissions shall be observed during each performance test run using the methods specified in IDAPA 58.01.01.625.

The quantity of fuel oil combusted by the boiler during the test shall be recorded in units of gallons per hour.

Enforceability

Federally Enforceable

Applicable Monitoring, Recordkeeping and Reporting Requirements

IDAPA 58.01.01.157

PTC No. P-050301, Condition 5.3

Evaluation of Current Compliance

In Compliance Now?

Yes

Basis for Determining Current Compliance Status:

Nitrogen oxides performance test of Boilers 1 and 2 while combusting #6 oil were completed June 5, 6, and 8, 2006. Due to operating problems with Boiler 2, the performance testing could not be completed within the 180 days of startup as required by the permit. DEQ approved an extension of time to complete the testing.

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Continuing Compliance Demonstration

Continuing Compliance Certification

This emissions unit will continue to comply with this applicable requirement.

Methods of Demonstrating Continuing Compliance

Continuing compliance will be demonstrated from review of PM performance testing records

Reporting Methods and Frequencies

For future performance evaluation reports, performance test reports will be submitted in accordance with IDAPA 58.01.01.157 and PTC No. P-050301, Condition 5.3. If any future performance evaluations are completed, a summary of the test results will be included in the semi-annual monitoring data, in accordance with provisions of the Tier I permit (IDAPA 58.01.01.322.08.c.)

BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I Permit Compliance Report will either certify compliance with this requirement, or if compliance cannot be certified, will provide an appropriate compliance schedule.

RECORDKEEPING REQUIREMENTS - BOILERS 1 AND 2

The following recordkeeping requirements apply collectively or jointly to Boilers 1 and 2.

Wet Scrubber Operating Parameters

PTC No. P-050301, Condition 4.16

The pressure drop, scrubbing solution pH and scrubbing solution flow rate shall be monitored and recorded once each week when the wet scrubbing system is required to be operated. Monitoring records shall be maintained onsite for a period of five years and made available to DEQ representatives upon request.

Enforceability

Federally Enforceable

Applicable Monitoring, Recordkeeping and Reporting Requirements

None

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Evaluation of Current Compliance

In Compliance Now?

Yes

Basis for Determining Current Compliance Status:

Review of available scrubber operating records and records maintenance procedures.

Continuing Compliance Demonstration

Continuing Compliance Certification

This emissions unit will continue to comply with this applicable requirement.

Methods of Demonstrating Continuing Compliance

Continuing compliance will be demonstrated from review of available scrubber operating records and records maintenance procedures.

Reporting Methods and Frequencies

Monitoring data reports will be submitted every six months, in accordance with provisions of the Tier I permit (IDAPA 58.01.01.322.08.c).

BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I Permit Compliance Report will either certify compliance with this requirement, or if compliance cannot be certified, will provide an appropriate compliance schedule.

REPORTING REQUIREMENTS - BOILERS 1 AND 2

The following reporting requirements apply collectively or jointly to Boilers 1 and 2.

NSPS Reports to EPA

PTC No. P-050301, Condition 5.2

A copy of all reports submitted to EPA for NSPS requirements shall also be submitted to DEQ. Reports to DEQ shall also include the same data for Boiler 1 as provided to EPA for Boiler 2.

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Enforceability

Federally Enforceable

Applicable Monitoring, Recordkeeping and Reporting Requirements

None

Evaluation of Current Compliance

In Compliance Now?

Yes

Basis for Determining Current Compliance Status:

Review of project files and correspondence.

Continuing Compliance Demonstration

Continuing Compliance Certification

This emissions unit will continue to comply with this applicable requirement.

Methods of Demonstrating Continuing Compliance

Continuing compliance will be demonstrated from reviews of project files and correspondence.

Reporting Methods and Frequencies

BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I Permit Compliance Report will either certify compliance with this requirement, or if compliance cannot be certified, will provide an appropriate compliance schedule.

BOILER 3

The discussion below provides information on applicable requirements that apply specifically to Boiler 3. Applicable requirements that apply to Boiler 3 jointly or collectively with Boilers 1 and 2 are discussed separately.

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EMISSION LIMITS - BOILER 3

The following emission limits apply to Boiler3.

PM10

PTC No. P-05030, Conditions 2.1 and 6

Emissions of PM10 from the exhaust stack of Boiler 3 shall not exceed 0.3 lb/hr, as determined by a pollutant specific U.S. EPA reference method (or DEQ approved alternative), or as determined DEQ's emission estimation methods used in this permit analysis.

Enforceability

Federally Enforceable

Applicable Monitoring, Recordkeeping and Reporting Requirements

None

Evaluation of Current Compliance

In Compliance Now?

Yes

Basis for Determining Current Compliance Status:

Compliance with the emission limit is based on emission calculation methods used by DEQ in the permit analysis and from tuning of Boiler 3 in accordance with PTC No. P-050301, Condition 3.8. Tuning of the boiler helps ensure that the emission factors used to estimate emissions are still valid.

Continuing Compliance Demonstration

Continuing Compliance Certification

This emissions unit will continue to comply with this applicable requirement.

Methods of Demonstrating Continuing Compliance

Compliance will be demonstrated by estimating emissions from boiler operating records (fuel usage or steam production) and emission factors used in the permit

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analysis and by tuning of Boiler 3 in accordance with PTC No. P-050301, Condition 3.8 to maintain efficient fuel combustion.

Reporting Methods and Frequencies

BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I Permit Compliance Report will either certify compliance with this requirement, or if compliance cannot be certified, will provide an appropriate compliance schedule.

Sulfur Dioxide

PTC No. P-05030, Conditions 2.1 and 6

Emissions of sulfur dioxide from the exhaust stack of Boiler 3 shall not exceed 1.9 lb/hr, as determined by a pollutant specific U.S. EPA reference method (or DEQ approved alternative), or as determined DEQ's emission estimation methods used in this permit analysis.

Enforceability

Federally Enforceable

Applicable Monitoring, Recordkeeping and Reporting Requirements

None

Evaluation of Current Compliance

In Compliance Now?

Yes

Basis for Determining Current Compliance Status:

Compliance with the emission limit is based on emission calculation methods used by DEQ in the permit analysis, from fuel supplier certification of the sulfur content of fuel oil delivered to the facility, and from tuning of Boiler 3 in accordance with PTC No. P-050301, Condition 3.8. Tuning of the boiler helps ensure that the emission factors used to estimate emissions are still valid.

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Continuing Compliance Demonstration

Continuing Compliance Certification

This emissions unit will continue to comply with this applicable requirement.

Methods of Demonstrating Continuing Compliance

Compliance will be demonstrated by estimating emissions from boiler operating records (fuel usage or steam production) and emission factors used in the permit analysis and by tuning of Boiler 3 in accordance with PTC No. P-050301, Condition 3.8 to maintain efficient fuel combustion.

Reporting Methods and Frequencies

BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I Permit Compliance Report will either certify compliance with this requirement, or if compliance cannot be certified, will provide an appropriate compliance schedule.

Nitrogen Oxides

PTC No. P-05030, Conditions 2.1 and 6

Emissions of nitrogen oxides from the exhaust stack of Boiler 3 shall not exceed 5.4 lb/hr, as determined by a pollutant specific U.S. EPA reference method (or DEQ approved alternative), or as determined DEQ's emission estimation methods used in this permit analysis.

Enforceability

Federally Enforceable

Applicable Monitoring, Recordkeeping and Reporting Requirements

None

Evaluation of Current Compliance

In Compliance Now?

Yes

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Basis for Determining Current Compliance Status:

Compliance with the emission limit is based on emission calculation methods used by DEQ in the permit analysis and from tuning of Boiler 3 in accordance with PTC No. P-050301, Condition 3.8. Tuning of the boiler helps ensure that the emission factors used to estimate emissions are still valid.

Continuing Compliance Demonstration

Continuing Compliance Certification

This emissions unit will continue to comply with this applicable requirement.

Methods of Demonstrating Continuing Compliance

Compliance will be demonstrated by estimating emissions from boiler operating records (fuel usage or steam production) and emission factors used in the permit analysis and by tuning of Boiler 3 in accordance with PTC No. P-050301, Condition 3.8 to maintain efficient fuel combustion.

Reporting Methods and Frequencies

BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I Permit Compliance Report will either certify compliance with this requirement, or if compliance cannot be certified, will provide an appropriate compliance schedule.

Carbon Monoxide

PTC No. P-05030, Conditions 2.1 and 6

Emissions of carbon monoxide from the exhaust stack of Boiler 3 shall not exceed 1.8 lb/hr, as determined by a pollutant specific U.S. EPA reference method (or DEQ approved alternative), or as determined DEQ's emission estimation methods used in this permit analysis.

Enforceability

Federally Enforceable

Applicable Monitoring, Recordkeeping and Reporting Requirements

None

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Evaluation of Current Compliance

In Compliance Now?

Yes

Basis for Determining Current Compliance Status:

Compliance with the emission limit is based on emission calculation methods used by DEQ in the permit analysis and from tuning of Boiler 3 in accordance with PTC No. P-050301, Condition 3.8. Tuning of the boiler helps ensure that the emission factors used to estimate emissions are still valid.

Continuing Compliance Demonstration

Continuing Compliance Certification

This emissions unit will continue to comply with this applicable requirement.

Methods of Demonstrating Continuing Compliance

Compliance will be demonstrated by estimating emissions from boiler operating records (fuel usage or steam production) and emission factors used in the permit analysis and by tuning of Boiler 3 in accordance with PTC No. P-050301, Condition 3.8 to maintain efficient fuel combustion.

Reporting Methods and Frequencies

BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I Permit Compliance Report will either certify compliance with this requirement, or if compliance cannot be certified, will provide an appropriate compliance schedule.

OPERATING REQUIREMENTS - BOILER 3

The following operating requirements apply to Boiler 2.

Annual Operating Schedule - Boiler 3

PTC No. P-050301, Condition 3.2

The quantity of natural gas combusted in Boiler 3 shall not exceed 328 million standard cubic feet (MMscf) per year, based on any consecutive 12-month period and the quantity

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of distillate oil combusted in Boiler 3 shall not exceed 393,120 gallons per year, based on any consecutive 12-month period.

Enforceability

Federally Enforceable

Applicable Monitoring, Recordkeeping and Reporting Requirements

PTC No. P-050301, Conditions 4.10.1 and 4.12

Evaluation of Current Compliance

In Compliance Now?

Yes

Basis for Determining Current Compliance Status:

Review of fuel combustion records for Boiler 3.

Continuing Compliance Demonstration

Continuing Compliance Certification

This emissions unit will continue to comply with this applicable requirement.

Methods of Demonstrating Continuing Compliance

Review of fuel combustion records for Boiler 3.

Reporting Methods and Frequencies

BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I Permit Compliance Report will either certify compliance with this requirement, or if compliance cannot be certified, will provide an appropriate compliance schedule.

MONITORING REQUIREMENTS – BOILER 3

There are no monitoring requirements that apply specifically to Boiler 3. Monitoring requirements that apply to all boilers collectively are presented separately, below.

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RECORDKEEPING REQUIREMENTS – BOILER 3

There are no recordkeeping requirements that apply specifically to Boiler 3. Recordkeeping requirements that apply to all boilers collectively are presented separately, below.

REPORTING REQUIREMENTS – BOILER 3

There are no reporting requirements that apply specifically to Boiler 3. Reporting requirements that apply to all boilers collectively are presented separately, below.

BOILERS 1, 2, AND 3

EMISSION LIMITS - BOILERS 1, 2, AND 3

The following emission limits apply collectively or jointly to Boiler 1, 2, and 3.

PM10

PTC No. P-05030, Conditions 2.1 and 6

Combined emissions of PM10 from the exhaust stacks of Boilers 1, 2, and 3 shall not exceed 18.3 ton/yr, as determined by a pollutant specific U.S. EPA reference method (or DEQ approved alternative), or as determined DEQ's emission estimation methods used in this permit analysis.

Enforceability

Federally Enforceable

Applicable Monitoring, Recordkeeping and Reporting Requirements

PTC No. P-050301, Condition 4.3
PTC No. P-050301, Condition 4.5
PTC No. P-050301, Condition 4.6.1
PTC No. P-050301, Condition 4.8
PTC No. P-050301, Condition 4.10.1
PTC No. P-050301, Condition 4.11
PTC No. P-050301, Condition 4.12
PTC No. P-050301, Condition 4.13
PTC No., P-050301, Condition 4.16

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Evaluation of Current Compliance

In Compliance Now?

Yes

Basis for Determining Current Compliance Status:

Compliance with the emission limit is based on:

- Engineering calculations of estimated emissions included in Appendices B and C. Initial performance tests of Boilers 1 and 2 were also conducted on June 5, 6, and 8, 2006. BAF is awaiting results of these performance tests.
- Boiler operating records (fuel combustion and/or steam production)
- Emission calculation methods used by DEQ in the permit analysis
- Tuning of boilers to ensure efficient combustion of fuel.

Continuing Compliance Demonstration

Continuing Compliance Certification

This emissions unit will continue to comply with this applicable requirement.

Methods of Demonstrating Continuing Compliance

Compliance with the emission limit will be based on:

- Performance testing of Boilers 1 and 2 and the wet scrubber system for the exhausts from Boilers 1 and 2
- Boiler operating records (fuel combustion and/or steam production)
- Emission calculation methods used by DEQ in the permit analysis
- Tuning of boilers to ensure efficient combustion of fuel.

Reporting Methods and Frequencies

BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I Permit Compliance Report will either certify compliance with this requirement, or if compliance cannot be certified, will provide an appropriate compliance schedule.

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Particulate Matter

IDAPA 58.01.01.676; PTC No. P-050301, Sec 2.7

Particulate matter emissions to the atmosphere from any boiler exhaust shall not exceed 0.015 gr/dscf of effluent gas corrected to 3% oxygen by volume for gas fuel and 0.050 gr/dscf of effluent gas corrected to 3% oxygen by volume for liquid fuel in accordance with IDAPA 58.01.01.676-677.

Enforceability

Federally Enforceable

Applicable Monitoring, Recordkeeping and Reporting Requirements

PTC No. P-050301, Conditions 4.7, 4.11, and 5.3
IDAPA 58.01.01.157

Evaluation of Current Compliance

In Compliance Now?

Yes

Basis for Determining Current Compliance Status:

For Boilers 1 and 2 compliance while combusting #6 oil is demonstrated from engineering calculations of estimated emissions included in Appendices B and C. Initial performance tests of Boilers 1 and 2 were also conducted on June 5, 6, and 8, 2006. BAF is awaiting results of these performance tests.

For Boiler 3 and for Boilers 1 and 2 while combusting distillate oil and natural gas, compliance is based on emission calculation methods used by DEQ in the permit analysis and from tuning of boilers in accordance with PTC No. P-050301, Condition 3.8.

Continuing Compliance Demonstration

Continuing Compliance Certification

These emissions units will continue to comply with this applicable requirement.

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Methods of Demonstrating Continuing Compliance

For Boilers 1 and 2 compliance while combusting #6 oil will be demonstrated from results of performance testing conducted on June 5, 6, and 8, 2006.

For Boiler 3 and for Boilers 1 and 2 while combusting distillate oil and natural gas, compliance will be demonstrated from emission calculation methods used by DEQ in the permit analysis and from tuning of boilers in accordance with PTC No. P-050301, Condition 3.8.

Reporting Methods and Frequencies

BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I Permit Compliance Report will either certify compliance with this requirement, or if compliance cannot be certified, will provide an appropriate compliance schedule.

Visible Emissions

IDAPA 58.01.01.625, 4/5/00; PTC No. P-050301, Condition 2.5

A person shall not discharge any air pollutant into the atmosphere from any point of emission for a period or periods aggregating more than three (3) minutes in any sixty (60) minute period which is greater than twenty percent (20%) opacity as determined by this section. This provision does not apply when the presence of uncombined water, nitrogen oxides and/or chlorine gas are the only reason(s) for the failure of the emission to comply with the requirements of this rule.

Enforceability

Federally Enforceable

Applicable Monitoring, Recordkeeping and Reporting Requirements

IDAPA 58.01.01.625

Evaluation of Current Compliance

In Compliance Now?

Yes

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Basis for Determining Current Compliance Status:

For Boilers 1 and 2 while combusting #6 oil, compliance is based on opacity performance testing using the NSPS Subpart Dc Alternative to COMS for Boiler Re-firing Project at Blackfoot, Idaho (approved by EPA Region X, 29 Sep 2005). For Boilers 1 and 2 while combusting distillate oil or natural gas and for Boiler 3 while combusting any fuel, compliance is based on quarterly inspections of significant emissions units for visible emissions.

Continuing Compliance Demonstration

Continuing Compliance Certification

This emissions unit will continue to comply with this applicable requirement.

Methods of Demonstrating Continuing Compliance

For Boilers 1 and 2 while combusting #6 oil, compliance will be based on opacity performance testing using the alternate opacity monitoring plan approved by EPA. For Boilers 1 and 2 while combusting distillate oil or natural gas and for Boiler 3 while combusting any fuel, compliance will be based on quarterly inspections of significant emissions units for visible emissions.

Reporting Methods and Frequencies

Monitoring data reports will be submitted every six months, in accordance with provisions of the Tier I permit (IDAPA 58.01.01.322.08.c).

BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I Permit Compliance Report will either certify compliance with this requirement, or if compliance cannot be certified, will provide an appropriate compliance schedule.

Sulfur Dioxide

PTC No. P-05030, Conditions 2.1 and 6

Combined emissions of sulfur dioxide from the exhaust stacks of Boilers 1, 2, and 3 shall not exceed 145 ton/yr, as determined by a pollutant specific U.S. EPA reference method (or DEQ approved alternative), or as determined DEQ's emission estimation methods used in this permit analysis.

Enforceability

Federally Enforceable

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Applicable Monitoring, Recordkeeping and Reporting Requirements

40 CFR 60.44c; PTC No. P-050301, Condition 4.2
40 CFR 60.46c; PTC No. P-050301, Condition 4.4
40 CFR 60.48c(g); PTC No. P-050301, Condition 4.10.1
PTC No. P-050301, Condition 4.12
PTC No. P-050301, Condition 4.13
PTC No. P-050301, Condition 4.16
40 CFR 60.48c(b); PTC No. P-050301, Condition 5.1.2
40 CFR 60.48c(e); PTC No. P-050301, Condition 5.1.5

Evaluation of Current Compliance

In Compliance Now?

Yes

Basis for Determining Current Compliance Status:

For Boilers 1 and 2 compliance is demonstrated from fuel sulfur content and engineering calculations of estimated emissions included in Appendices B and C. The initial Relative Accuracy Test Audit of the SO₂ CEMS was conducted on June 5, 6, and 8, 2006. BAF is awaiting results of these performance tests.

For Boiler 3 and for emissions from Boilers 1 and 2 that are not measured by the CEMS, compliance is demonstrated with emission calculation methods used by DEQ in the permit analysis. These calculations will use records of boiler operating hours, boiler steam production, boiler fuel usage, and fuel receipts from the fuel supplier documenting that fuel oil meets fuel sulfur content limits.

Continuing Compliance Demonstration

Continuing Compliance Certification

These emissions units will continue to comply with this applicable requirement.

Methods of Demonstrating Continuing Compliance

Compliance will be demonstrated by summing total sulfur dioxide emissions from each boiler. Sulfur dioxide emissions from Boilers 1 and 2 will be based on CEMS measurements whenever CEMS data are available.

For Boiler 3 and for emissions from Boilers 1 and 2 that are not measured by the CEMS, sulfur dioxide emissions will be demonstrated with emission calculation methods used by DEQ in the permit analysis. These calculations will use records of boiler operating hours, boiler steam production, boiler fuel usage, and fuel receipts

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from the fuel supplier documenting that fuel oil meets fuel sulfur content limits. These calculations will assume that all sulfur in the fuel is converted to sulfur dioxide.

Reporting Methods and Frequencies

BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I Permit Compliance Report will either certify compliance with this requirement, or if compliance cannot be certified, will provide an appropriate compliance schedule.

Nitrogen Oxides

PTC No. P-05030, Conditions 2.1, 2.8, and 6

Combined emissions of nitrogen oxides from the exhaust stacks of Boilers 1, 2, and 3 shall not exceed 198 ton/yr, as determined by a pollutant specific U.S. EPA reference method (or DEQ approved alternative), or as determined DEQ's emission estimation methods used in this permit analysis.

Applicable Monitoring, Recordkeeping and Reporting Requirements

PTC No. P-050301, Condition 4.9
PTC No. P-050301, Condition 4.10.1
PTC No. P-050301, Condition 4.11
PTC No. P-050301, Condition 4.12

Evaluation of Current Compliance

In Compliance Now?

Yes

Basis for Determining Current Compliance Status:

Compliance with the emission limit is based on:

- Engineering calculations of estimated emissions included in Appendices B and C. Initial performance tests of Boilers 1 and 2 were also conducted on June 5, 6, and 8, 2006. BAF is awaiting results of these performance tests.
- Boiler operating records (fuel combustion and/or steam production)
- Emission calculation methods used by DEQ in the permit analysis
- Tuning of boilers to ensure efficient combustion of fuel.

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Continuing Compliance Demonstration

Continuing Compliance Certification

This emissions unit will continue to comply with this applicable requirement.

Methods of Demonstrating Continuing Compliance

Compliance with the emission limit will be based on:

- Performance testing of Boilers 1 and 2
- Boiler operating records (fuel combustion and/or steam production)
- Emission calculation methods used by DEQ in the permit analysis
- Tuning of boilers to ensure efficient combustion of fuel.

Reporting Methods and Frequencies

BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I Permit Compliance Report will either certify compliance with this requirement, or if compliance cannot be certified, will provide an appropriate compliance schedule.

Carbon Monoxide

PTC No. P-05030, Conditions 2.1 and 6

Combined emissions of carbon monoxide from the exhaust stacks of Boilers 1, 2, and 3 shall not exceed 46 ton/yr, as determined by a pollutant specific U.S. EPA reference method (or DEQ approved alternative), or as determined DEQ's emission estimation methods used in this permit analysis.

Applicable Monitoring, Recordkeeping and Reporting Requirements

PTC No. P-050301, Condition 4.9
PTC No. P-050301, Condition 4.10.1
PTC No. P-050301, Condition 4.11
PTC No. P-050301, Condition 4.12

Evaluation of Current Compliance

In Compliance Now?

Yes

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Basis for Determining Current Compliance Status:

Compliance with the emission limit is based on:

- Boiler operating records (fuel combustion and/or steam production)
- Emission calculation methods used by DEQ in the permit analysis
- Tuning of boilers to ensure efficient combustion of fuel.

Continuing Compliance Demonstration

Continuing Compliance Certification

This emissions unit will continue to comply with this applicable requirement.

Methods of Demonstrating Continuing Compliance

Compliance with the emission limit will be based on:

- Performance testing of Boilers 1 and 2
- Boiler operating records (fuel combustion and/or steam production)
- Emission calculation methods used by DEQ in the permit analysis
- Tuning of boilers to ensure efficient combustion of fuel.

Reporting Methods and Frequencies

BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I Permit Compliance Report will either certify compliance with this requirement, or if compliance cannot be certified, will provide an appropriate compliance schedule.

OPERATING REQUIREMENTS - BOILERS 1, 2, AND 3

The following operating requirements apply collectively or jointly to Boiler 1, 2, and 3.

Fuel Specifications

IDAPA 58.01.01.727-728, 5/1/94; PTC No. P-050301, Condition 3.1

Boilers 1 and 2 may burn natural gas, distillate oil, or residual oil. Boiler 3 may burn natural gas fuel as primary fuel and low sulfur distillate oil as secondary fuel.

The sulfur content of fuels burned in the boilers shall not exceed the following amounts:

- Distillate oil burned in Boiler 3 shall not exceed 0.05% sulfur by weight;

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- Distillate oil burned in Boiler 1 and Boiler 2 shall not exceed 0.5% sulfur by weight in accordance with IDAPA 58.01.01.728, and;
- Residual oil burned in Boiler 1 and Boiler 2 shall not exceed 1.75% sulfur by weight in accordance with IDAPA 58.01.01.727.

Enforceability

Federally Enforceable

Applicable Monitoring, Recordkeeping and Reporting Requirements

PTC No. P-050301, Condition 4.13

Evaluation of Current Compliance

In Compliance Now?

Yes

Basis for Determining Current Compliance Status:

Fuel supplier delivery receipts

Continuing Compliance Demonstration

Continuing Compliance Certification

This emissions unit will continue to comply with this applicable requirement.

Methods of Demonstrating Continuing Compliance

Continuing compliance will be demonstrated from fuel supplier delivery receipts.

Reporting Methods and Frequencies

Monitoring data reports will be submitted every six months, in accordance with provisions of the Tier I permit (IDAPA 58.01.01.322.08.c).

BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I Permit Compliance Report will either certify compliance with this requirement, or if compliance cannot be certified, will provide an appropriate compliance schedule.

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Simultaneous Boiler Operation – Boilers 1, 2, and 3

PTC No. P-050301, Condition 3.4

Whenever residual oil is combusted in Boiler 1 or Boiler 2, the combined quantity of steam produced by all three boilers shall not exceed 80,000 pounds per hour, based on a daily average.

Enforceability

Federally Enforceable

Applicable Monitoring, Recordkeeping and Reporting Requirements

PTC No. P-050301, Condition 4.12

Evaluation of Current Compliance

In Compliance Now?

Yes

Basis for Determining Current Compliance Status:

Compliance is determined from boiler operating records indicating the days when residual oil is combusted in Boiler 1 and/or Boiler 2 and the amount of steam produced by all three boilers on those days when residual oil is combusted.

Continuing Compliance Demonstration

Continuing Compliance Certification

This emissions unit will continue to comply with this applicable requirement.

Methods of Demonstrating Continuing Compliance

Continuing compliance will be demonstrated from boiler operating records indicating the days when residual oil is combusted in Boiler 1 and/or Boiler 2 and the amount of steam produced by all three boilers on those days when residual oil is combusted.

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Reporting Methods and Frequencies

Monitoring data reports will be submitted every six months, in accordance with provisions of the Tier I permit (IDAPA 58.01.01.322.08.c).

BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I Permit Compliance Report will either certify compliance with this requirement, or if compliance cannot be certified, will provide an appropriate compliance schedule.

Annual Boiler Tune-Up

PTC No. P-050301, Condition 3.8

The burners in each boiler shall be tuned annually to maintain efficient fuel combustion.

Enforceability

Federally Enforceable

Applicable Monitoring, Recordkeeping and Reporting Requirements

PTC No. P-050301, Condition 4.11

Evaluation of Current Compliance

In Compliance Now?

Yes

Basis for Determining Current Compliance Status:

According to BAF records, the boilers were tuned on xxx xx, 20xx

Continuing Compliance Demonstration

Continuing Compliance Certification

This emissions unit will continue to comply with this applicable requirement.

Methods of Demonstrating Continuing Compliance

Continuing compliance will be demonstrated from records of boiler tuning maintained pursuant to PTC No. P-050301, Condition 4.11.

APPLICATION FOR RENEWAL OF TIER I AIR OPERATING PERMIT - BLACKFOOT FACILITY OF BASIC AMERICAN FOODS

Reporting Methods and Frequencies

BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I Permit Compliance Report will either certify compliance with this requirement, or if compliance cannot be certified, will provide an appropriate compliance schedule.

MONITORING REQUIREMENTS - BOILERS 1, 2, AND 3

There are no monitoring requirements that apply collectively or jointly to Boiler 1, 2, and 3.

RECORDKEEPING REQUIREMENTS - BOILERS 1, 2, AND 3

The following recordkeeping requirements apply collectively or jointly to Boiler 1, 2, and 3.

Records Retention

PTC No., P-050301, Condition 4.15

The permittee shall maintain sufficient records to assure compliance with all of the terms and conditions of this permit. All monitoring records and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report, or application. All records required to be maintained by this permit shall be made available in either hard copy or electronic format to DEQ representatives upon request.

Enforceability

Federally Enforceable

Applicable Monitoring, Recordkeeping and Reporting Requirements

None

Evaluation of Current Compliance

In Compliance Now?

Yes

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Basis for Determining Current Compliance Status:

Records are maintained in accordance with all specific monitoring and recordkeeping requirements that are applicable, as detailed in the compliance evaluations for each individual monitoring and recordkeeping requirement.

Additional data are maintained as necessary to fill gaps in recordkeeping needed to demonstrate compliance with applicable emission limits and operating requirements.

Continuing Compliance Demonstration

Continuing Compliance Certification

This emissions unit will continue to comply with this applicable requirement.

Methods of Demonstrating Continuing Compliance

Continuing compliance will be demonstrated by certifying that records have been developed and maintained as required in the Tier I permit to be issued for the Blackfoot Plant. Note that, pursuant to IDAPA 58.01.01.322.06.b, the Tier I permit is to include all applicable monitoring and analysis requirements. In addition, where existing monitoring and recordkeeping are not sufficient to demonstrate compliance with an emission limit or operating requirement, additional requirements will be included in the Tier I permit to fill the monitoring gap, pursuant to IDAPA 58.01.01.322.06.c. Accordingly, obtaining and recording data in accordance with provisions of the Tier I is sufficient to assure compliance with all of the terms and conditions of this permit.

BAF will review records retention practices to verify that records are maintained for five years.

Reporting Methods and Frequencies

BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I Permit Compliance Report will either certify compliance with this requirement, or if compliance cannot be certified, will provide an appropriate compliance schedule.

Fuel Usage Records

PTC No. P-050301, Condition 4.12

The following operating data shall be monitored and recorded for Boilers 1, 2, and 3:

- On a monthly basis, record the quantity of natural gas combusted in Boiler 3 in units of MMscf per month and MMscf per consecutive 12-month period. The annual fuel

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consumption shall be determined by summing the most recent monthly quantity and the monthly quantities over the previous consecutive 11-month period.

- On a monthly basis, record the quantity of distillate oil combusted in Boiler 3 in units of gallons per month and gallons per consecutive 12-month period.
- On a monthly basis, record the combined quantity of residual oil combusted in Boiler 1 and Boiler 2 in units of gallons per month and gallons per consecutive 12-month period.
- On a daily basis, record the date and the combined quantity of residual oil combusted that day in Boiler 1 and Boiler 2.
- Each day that residual oil is combusted in Boiler 1 and Boiler 2 at the same time, and Boiler 3 is also operated, record the following: date; total combined pounds of steam produced that day by all three boilers; and the combined average quantity of steam produced by all three boilers in units of pounds per hour, based on a daily average.

Enforceability

Federally Enforceable

Applicable Monitoring, Recordkeeping and Reporting Requirements

PTC No. P-050301, Condition 4.15

Evaluation of Current Compliance

In Compliance Now?

Yes

Basis for Determining Current Compliance Status:

Review of current boiler operating recordkeeping procedures.

Continuing Compliance Demonstration

Continuing Compliance Certification

This emissions unit will continue to comply with this applicable requirement.

Methods of Demonstrating Continuing Compliance

Continuing compliance will be demonstrated from reviews of boiler operating recordkeeping procedures.

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Reporting Methods and Frequencies

BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I Permit Compliance Report will either certify compliance with this requirement, or if compliance cannot be certified, will provide an appropriate compliance schedule.

Fuel Sulfur Content Records

IDAPA 58.01.01.727-728, 5/1/94; PTC No. P-050301, Condition 4.13

For each shipment of fuel oil received, the permittee shall obtain and maintain at the facility fuel receipts from the fuel supplier which demonstrate the oil received complies with the fuel sulfur content limits specified in Permit Condition 3.9.2 and IDAPA 58.01.01.725-728.

Enforceability

Federally Enforceable

Applicable Monitoring, Recordkeeping and Reporting Requirements

PTC No. P-050301, Condition 4.15

Evaluation of Current Compliance

In Compliance Now?

Yes

Basis for Determining Current Compliance Status:

Reviews of boiler fuel delivery receipts.

Continuing Compliance Demonstration

Continuing Compliance Certification

This emissions unit will continue to comply with this applicable requirement.

Methods of Demonstrating Continuing Compliance

Continuing compliance will be demonstrated from reviews of boiler fuel delivery receipts.

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Reporting Methods and Frequencies

BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I Permit Compliance Report will either certify compliance with this requirement, or if compliance cannot be certified, will provide an appropriate compliance schedule.

Boiler Tuning Records

PTC No. P-050301, Condition 4.11

Records shall be maintained of boiler tuning providing the date the tuning was conducted and a description of adjustments made to the burners to improve combustion efficiency.

Enforceability

Federally Enforceable

Applicable Monitoring, Recordkeeping and Reporting Requirements

PTC No. P-050301, Condition 4.15

Evaluation of Current Compliance

In Compliance Now?

Yes

Basis for Determining Current Compliance Status:

Review of boiler maintenance records to verify that boiler tuning records are being maintained.

Continuing Compliance Demonstration

Continuing Compliance Certification

This emissions unit will continue to comply with this applicable requirement.

Methods of Demonstrating Continuing Compliance

Continuing compliance will be demonstrated from review of boiler maintenance records to verify that boiler tuning records are being maintained.

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Reporting Methods and Frequencies

BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I Permit Compliance Report will either certify compliance with this requirement, or if compliance cannot be certified, will provide an appropriate compliance schedule.

REPORTING REQUIREMENTS - BOILERS 1, 2, AND 3

The following reporting requirements apply collectively or jointly to Boiler 1, 2, and 3.

Performance Test Reports

PTC No. P-050301, Condition 5.2

Each performance test report, including the required process data, shall be submitted to DEQ within 60 days of the date on which the performance test is conducted unless specified otherwise in this permit.

Enforceability

Federally Enforceable

Applicable Monitoring, Recordkeeping and Reporting Requirements

None

Evaluation of Current Compliance

In Compliance Now?

Yes

Basis for Determining Current Compliance Status:

Initial performance testing under PTC P-050301 was conducted on June 5, 6, and 8, 2006. Reports have not yet been submitted because performance test reports have not yet been completed. BAF expects that the performance test reports will be submitted within 60 days of completing the performance tests.

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Continuing Compliance Demonstration

Continuing Compliance Certification

This emissions unit will continue to comply with this applicable requirement.

Methods of Demonstrating Continuing Compliance

Continuing compliance will be demonstrated by reviewing project correspondence files to verify that performance test reports were submitted in accordance with this requirement.

Reporting Methods and Frequencies

BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I Permit Compliance Report will either certify compliance with this requirement, or if compliance cannot be certified, will provide an appropriate compliance schedule.

PLANT PRODUCTION

PROCESS A

The discussion below provides information on applicable requirements that apply to Process A.

EMISSION LIMITS - PROCESS A

The following emissions limits apply to Process A emissions units.

Visible Emissions

IDAPA 58.01.01.625

No person shall not discharge any air pollutant to the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as determined by procedures contained in IDAPA 58.01.01.625. These provisions shall not apply when the presence of uncombined water, nitrogen oxides, and/or chlorine gas are the only reason(s) for the failure of the emission to comply with the requirements of this section.

Enforceability

Federally Enforceable

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Applicable Monitoring, Recordkeeping and Reporting Requirements

IDAPA 58.01.01.625.04

Evaluation of Current Compliance

In Compliance Now?

Yes

Basis for Determining Current Compliance Status:

In accordance with the current Tier I permit for the Blackfoot Plant (Permit No. T1-050308), BAF conducts a quarterly one-minute observation of each significant emissions point or source in Process A, using EPA Method 22 (in 40 CFR 60, Appendix A). If visible emissions in excess of 10% opacity are observed from any emissions point or source, BAF conducts a six-minute observation, using EPA Method 9. The visible emissions evaluation is performed during daylight hours under normal operating conditions.

Since the current Tier I permit was issued, no visible emissions exceeding 10% have been observed.

Continuing Compliance Demonstration

Continuing Compliance Certification

This emissions unit will continue to comply with this applicable requirement.

Methods of Demonstrating Continuing Compliance

Continuing compliance will be demonstrated by conducting visible emissions observations as required in the Tier I permit to be issued to the Blackfoot Plant. BAF expects that process visible emissions monitoring requirements in the new permit will be the same as those contained in Section 4.3 of the current permit.

Reporting Methods and Frequencies

Monitoring data reports will be submitted every six months, in accordance with provisions of the Tier I permit (IDAPA 58.01.01.322.08.c).

BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I Permit Compliance Report will either certify compliance with this requirement, or if compliance cannot be certified, will provide an appropriate compliance schedule.

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Particulate Matter

IDAPA 58.01.01.700-703

A person shall not discharge to the atmosphere from any source operating prior to October 1, 1979 particulate matter in excess of the amount shown by the following equations, where E is the allowable emission from the entire source in pounds per hour, and PW is the process weight in pounds per hour:

If PW is less than 17,000 lb/hr, $E = 0.045(PW)^{0.6}$

If PW is equal to or greater than 17,000 lb/hr, $E = 1.12(PW)^{0.27}$

Emissions shall be averaged according to the following, whichever is the lesser period of time:

- One (1) complete cycle of operation; or
- One (1) hour of operation representing worst-case conditions for the emissions of particulate matter.

Demonstrating compliance with the visible emissions requirements contained in PTC No. P-050301, Condition 6.3 inherently demonstrates compliance with the process weight PM emissions limitations.

Enforceability

Federally Enforceable

Applicable Monitoring, Recordkeeping and Reporting Requirements

IDAPA 58.01.01.700.04

Evaluation of Current Compliance

In Compliance Now?

Yes

Basis for Determining Current Compliance Status:

As indicated in Section 3, the Process Weight, PW, for Process A is 25,000 lb/hr. The allowable emission rate, E, is then 17.2 lb/hr. From the emission tables in Appendix C, hourly PM emissions from all Process A stacks is 14.9 lb/hr:

Stack	Emission rate, lb/hr
DHQ	5.61
DHT	2.37

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Stack	Emission rate, lb/hr
DHU	2.37
DHZ	3.90
DKV	0.68
DKW	0.02
Total	14.94

Continuing Compliance Demonstration

Continuing Compliance Certification

This emissions unit will continue to comply with this applicable requirement.

Methods of Demonstrating Continuing Compliance

As indicated above, Process A will not exceed the process weight rate limits at the input rate. Therefore, no throughput monitoring or recordkeeping is required to demonstrate compliance. Routine visible emission monitoring proposed to demonstrate compliance with IDAPA 58.01.01.625 will be used to verify that Process A emissions units are functioning normally.

Reporting Methods and Frequencies

Monitoring data reports will be submitted every six months, in accordance with provisions of the Tier I permit (IDAPA 58.01.01.322.08.c).

BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I Permit Compliance Report will either certify compliance with this requirement, or if compliance cannot be certified, will provide an appropriate compliance schedule.

OPERATING REQUIREMENTS - PROCESS A

There are no operating requirements that are specifically applicable to Process A. Process A emissions units are subject to generic operating requirements included in the Plant Process.

MONITORING REQUIREMENTS - PROCESS A

The following monitoring requirements apply to Process A emissions units.

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Performance Testing - Particulate Matter Process Weight Limitations

IDAPA 58.01.01.700.4

The appropriate test method under Sections 700 through 703 shall be EPA Method 5 contained in 40 CFR Part 60 or such comparable and equivalent methods approved in accordance with Subsection 157.02.d. Test methods and procedures shall comply with Section 157.

Enforceability

Federally Enforceable

Applicable Monitoring, Recordkeeping and Reporting Requirements

IDAPA 58.01.01.157.04

Evaluation of Current Compliance

In Compliance Now?

Yes

Basis for Determining Current Compliance Status:

Particulate emission estimates are based on emission factors developed from EPA Method 5 testing of selected stacks at BAF facilities. These factors are supplemented with additional particulate emission measurements made using a high-volume sampling method (Oregon Method 8 under isokinetic sampling conditions). Protocols for both the EPA Method 5 and Oregon Method 5 testing programs were submitted to and approved by DEQ.

Continuing Compliance Demonstration

Continuing Compliance Certification

This emissions unit will continue to comply with this applicable requirement.

Methods of Demonstrating Continuing Compliance

Continuing compliance will be demonstrated by estimating emissions from emission factors based on Method 5 emission tests and from other emission estimating procedures acceptable to DEQ, including Oregon Method 8 sampling results.

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Reporting Methods and Frequencies

If additional source tests for particulate emissions are conducted, results of these tests will be reported to DEQ in accordance with IDAPA 58.01.01.157.04. In addition, a summary of the results will be included in the next semi-annual report on monitoring data.

BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I Permit Compliance Report will either certify compliance with this requirement, or if compliance cannot be certified, will provide an appropriate compliance schedule.

RECORDKEEPING REQUIREMENTS - PROCESS A

There are no recordkeeping requirements that are specifically applicable to Process A. Process A emissions units are subject to generic recordkeeping requirements included in the Plant Process.

REPORTING REQUIREMENTS - PROCESS A

There are no reporting requirements that are specifically applicable to Process A. Process A emissions units are subject to generic recordkeeping requirements included in the Plant Process.

PROCESS B

The discussion below provides information on applicable requirements that apply to Process B.

EMISSION LIMITS - PROCESS B

The following emissions limits apply Process B emissions units.

Visible Emissions

IDAPA 58.01.01.625

No person shall not discharge any air pollutant to the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as determined by procedures contained in IDAPA 58.01.01.625. These provisions shall not apply when the presence of uncombined water, nitrogen oxides, and/or chlorine gas are the only reason(s) for the failure of the emission to comply with the requirements of this section.

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Enforceability

Federally Enforceable

Applicable Monitoring, Recordkeeping and Reporting Requirements

IDAPA 58.01.01.625.04

Evaluation of Current Compliance

In Compliance Now?

Yes

Basis for Determining Current Compliance Status:

In accordance with Section 5.3 of the current Tier I permit for the Blackfoot Plant (Permit No. T1-050308), BAF conducts a quarterly one-minute observation of each significant emissions point or source in Process B, using EPA Method 22 (in 40 CFR 60, Appendix A). If visible emissions in excess of 10% opacity are observed from any emissions point or source, BAF conducts a six-minute observation, using EPA Method 9. The visible emissions evaluation is performed during daylight hours under normal operating conditions.

Since the current Tier I permit was issued, no visible emissions exceeding 10% have been observed from Process B stacks.

Continuing Compliance Demonstration

Continuing Compliance Certification

This emissions unit will continue to comply with this applicable requirement.

Methods of Demonstrating Continuing Compliance

Continuing compliance will be demonstrated by conducting visible emissions observations as required in the Tier I permit to be issued to the Blackfoot Plant. BAF expects that process visible emissions monitoring requirements in the new permit will be the same as those contained in Section 5.3 of the current permit.

Reporting Methods and Frequencies

Monitoring data reports will be submitted every six months, in accordance with provisions of the Tier I permit (IDAPA 58.01.01.322.08.c).

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BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I Permit Compliance Report will either certify compliance with this requirement, or if compliance cannot be certified, will provide an appropriate compliance schedule.

Particulate Matter

IDAPA 58.01.01.700-703

A person shall not discharge to the atmosphere from any source operating prior to October 1, 1979 particulate matter in excess of the amount shown by the following equations, where E is the allowable emission from the entire source in pounds per hour, and PW is the process weight in pounds per hour:

If PW is less than 17,000 lb/hr, $E = 0.045(PW)^{0.6}$

If PW is equal to or greater than 17,000 lb/hr, $E = 1.12(PW)^{0.27}$

Emissions shall be averaged according to the following, whichever is the lesser period of time:

- One (1) complete cycle of operation; or
- One (1) hour of operation representing worst-case conditions for the emissions of particulate matter.

Demonstrating compliance with the visible emissions requirements contained in PTC No. P-050301, Condition 6.3 inherently demonstrates compliance with the process weight PM emissions limitations.

Enforceability

Federally Enforceable

Applicable Monitoring, Recordkeeping and Reporting Requirements

IDAPA 58.01.01.700.04

Evaluation of Current Compliance

In Compliance Now?

Yes

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Basis for Determining Current Compliance Status:

As indicated in Section 3, the Process Weight, PW, for Process B is 50,000 lb/hr. The allowable emission rate, E, is then 20.8 lb/hr. From the emission tables in Appendix C, hourly PM emissions from all Process B stacks are 18.8 lb/hr:

Stack	Emission rate, lb/hr
DXS	0.07
DUO	0.07
DPY	0.07
DPZ	0.07
DUO	2.37
DUT	2.37
DQA	2.37
DQB	2.37
DUV	7.80
DSO	0.45
DSK	0.13
DUY	0.04
DUZ	0.04
DUU	0.54
DRY	0.07
Total	18.80

Continuing Compliance Demonstration

Continuing Compliance Certification

This emissions unit will continue to comply with this applicable requirement.

Methods of Demonstrating Continuing Compliance

As indicated above, Process B will not exceed the process weight rate limits at the input rate. Therefore, no throughput monitoring or recordkeeping is required to demonstrate compliance. Routine visible emission monitoring proposed to demonstrate compliance with IDAPA 58.01.01.625 will be used to verify that Process B emissions units are functioning normally.

Reporting Methods and Frequencies

Monitoring data reports will be submitted every six months, in accordance with provisions of the Tier I permit (IDAPA 58.01.01.322.08.c).

BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I

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Permit Compliance Report will either certify compliance with this requirement, or if compliance cannot be certified, will provide an appropriate compliance schedule.

OPERATING REQUIREMENTS - PROCESS B

There are no operating requirements that are specifically applicable to Process B. Process B emissions units are subject to generic operating requirements included in the Plant Process.

MONITORING REQUIREMENTS - PROCESS B

The following monitoring requirements apply to Process B emissions units.

Performance Testing - Particulate Matter Process Weight Limitations

IDAPA 58.01.01.700.4

The appropriate test method under Sections 700 through 703 shall be EPA Method 5 contained in 40 CFR Part 60 or such comparable and equivalent methods approved in accordance with Subsection 157.02.d. Test methods and procedures shall comply with Section 157.

Enforceability

Federally Enforceable

Applicable Monitoring, Recordkeeping and Reporting Requirements

IDAPA 58.01.01.157.04

Evaluation of Current Compliance

In Compliance Now?

Yes

Basis for Determining Current Compliance Status:

Particulate emission estimates are based on emission factors developed from EPA Method 5 testing of selected stacks at BAF facilities. These factors are supplemented with additional particulate emission measurements made using a high-volume sampling method (Oregon Method 8 under isokinetic sampling conditions). Protocols for both the EPA Method 5 and Oregon Method 5 testing programs were submitted to and approved by DEQ.

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Continuing Compliance Demonstration

Continuing Compliance Certification

This emissions unit will continue to comply with this applicable requirement.

Methods of Demonstrating Continuing Compliance

Continuing compliance will be demonstrated by estimating emissions from emission factors based on Method 5 emission tests and from other emission estimating procedures acceptable to DEQ, including Oregon Method 8 sampling results.

Reporting Methods and Frequencies

If additional source tests for particulate emissions are conducted, results of these tests will be reported to DEQ in accordance with IDAPA 58.01.01.157.04. In addition, a summary of the results will be included in the next semi-annual report on monitoring data.

BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I Permit Compliance Report will either certify compliance with this requirement, or if compliance cannot be certified, will provide an appropriate compliance schedule.

RECORDKEEPING REQUIREMENTS - PROCESS B

There are no recordkeeping requirements that are specifically applicable to Process B. Process B emissions units are subject to generic recordkeeping requirements included in the Plant Process.

REPORTING REQUIREMENTS - PROCESS B

There are no reporting requirements that are specifically applicable to Process B. Process B emissions units are subject to generic recordkeeping requirements included in the Plant Process.

PROCESS C

The discussion below provides information on applicable requirements that apply to Process C.

EMISSION LIMITS - PROCESS C

The following emissions limits apply Process C emissions units.

**APPLICATION FOR RENEWAL OF TIER I AIR OPERATING PERMIT - BLACKFOOT
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Visible Emissions

IDAPA 58.01.01.625

No person shall not discharge any air pollutant to the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as determined by procedures contained in IDAPA 58.01.01.625. These provisions shall not apply when the presence of uncombined water, nitrogen oxides, and/or chlorine gas are the only reason(s) for the failure of the emission to comply with the requirements of this section.

Enforceability

Federally Enforceable

Applicable Monitoring, Recordkeeping and Reporting Requirements

IDAPA 58.01.01.625.04

Evaluation of Current Compliance

In Compliance Now?

Yes

Basis for Determining Current Compliance Status:

In accordance with Section 6.3 of the current Tier I permit for the Blackfoot Plant (Permit No. T1-050308), BAF conducts a quarterly one-minute observation of each significant emissions point or source in Process C, using EPA Method 22 (in 40 CFR 60, Appendix A). If visible emissions in excess of 10% opacity are observed from any emissions point or source, BAF conducts a six-minute observation, using EPA Method 9. The visible emissions evaluation is performed during daylight hours under normal operating conditions.

Since the current Tier I permit was issued, no visible emissions exceeding 10% have been observed from Process C stacks.

Continuing Compliance Demonstration

Continuing Compliance Certification

This emissions unit will continue to comply with this applicable requirement.

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Methods of Demonstrating Continuing Compliance

Continuing compliance will be demonstrated by conducting visible emissions observations as required in the Tier I permit to be issued to the Blackfoot Plant. BAF expects that process visible emissions monitoring requirements in the new permit will be the same as those contained in Section 6.3 of the current permit.

Reporting Methods and Frequencies

Monitoring data reports will be submitted every six months; in accordance with provisions of the Tier I permit (IDAPA 58.01.01.322.08.c).

BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I Permit Compliance Report will either certify compliance with this requirement, or if compliance cannot be certified, will provide an appropriate compliance schedule.

Particulate Matter

IDAPA 58.01.01.700-703

A person shall not discharge to the atmosphere from any source operating prior to October 1, 1979 particulate matter in excess of the amount shown by the following equations, where E is the allowable emission from the entire source in pounds per hour, and PW is the process weight in pounds per hour:

If PW is less than 17,000 lb/hr, $E = 0.045(PW)^{0.6}$

If PW is equal to or greater than 17,000 lb/hr, $E = 1.12(PW)^{0.27}$

Emissions shall be averaged according to the following, whichever is the lesser period of time:

- One (1) complete cycle of operation; or
- One (1) hour of operation representing worst-case conditions for the emissions of particulate matter.

Demonstrating compliance with the visible emissions requirements contained in PTC No. P-050301, Condition 6.3 inherently demonstrates compliance with the process weight PM emissions limitations.

Enforceability

Federally Enforceable

Applicable Monitoring, Recordkeeping and Reporting Requirements

IDAPA 58.01.01.700.04

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Evaluation of Current Compliance

In Compliance Now?

Yes

Basis for Determining Current Compliance Status:

As indicated in Section 3, the Process Weight, PW, for Process C is 170,000 lb/hr. The allowable emission rate, E, is then 25.8 lb/hr. From the emission tables in Appendix C, hourly PM emissions from all Process C stacks are 23.4 lb/hr:

Stack	Emission rate, lb/hr
ALB	0.21
ALQ	0.11
ALT	0.02
ALY	0.01
ALV	0.31
ALW	0.17
ALX	0.03
AEV	0.28
AEW	0.17
AGQ	0.01
CIR	1.21
CHV	0.04
IBE	0.10
CXX	3.38
CYY	2.85
CHX	1.65
CHY	0.62
CHZ	0.31
HEB	2.59
HNL	0.62
CBB	2.11
CNV	0.32
CNW	0.32
CTU	1.48
CTO	0.64
CTR	0.55
CTS	0.23
CTT	0.27
TCD	0.46
TCO	0.46
TAC	0.06
TAH	0.06
TEM	0.13

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Stack	Emission rate, lb/hr
TEE	0.11
ENV	0.00
EUW	0.00
DSX	0.02
CHI	0.40
CHK	0.40
EGS	0.04
EGT	0.04
ENR	0.04
EDO	0.04
FIF	0.56
Total	23.40

Continuing Compliance Demonstration

Continuing Compliance Certification

This emissions unit will continue to comply with this applicable requirement.

Methods of Demonstrating Continuing Compliance

As indicated above, Process C will not exceed the process weight rate limits at the input rate. Therefore, no throughput monitoring or recordkeeping is required to demonstrate compliance. Routine visible emission monitoring proposed to demonstrate compliance with IDAPA 58.01.01.625 will be used to verify that Process C emissions units are functioning normally.

Reporting Methods and Frequencies

Monitoring data reports will be submitted every six months; in accordance with provisions of the Tier I permit (IDAPA 58.01.01.322.08.c).

BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I Permit Compliance Report will either certify compliance with this requirement, or if compliance cannot be certified, will provide an appropriate compliance schedule.

OPERATING REQUIREMENTS - PROCESS C

There are no operating requirements that are specifically applicable to Process C. Process C emissions units are subject to generic operating requirements included in the Plant Process.

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MONITORING REQUIREMENTS - PROCESS C

The following monitoring requirements apply to Process C emissions units.

Performance Testing - Particulate Matter Process Weight Limitations

IDAPA 58.01.01.700.4

The appropriate test method under Sections 700 through 703 shall be EPA Method 5 contained in 40 CFR Part 60 or such comparable and equivalent methods approved in accordance with Subsection 157.02.d. Test methods and procedures shall comply with Section 157.

Enforceability

Federally Enforceable

Applicable Monitoring, Recordkeeping and Reporting Requirements

IDAPA 58.01.01.157.04

Evaluation of Current Compliance

In Compliance Now?

Yes

Basis for Determining Current Compliance Status:

Particulate emission estimates are based on emission factors developed from EPA Method 5 testing of selected stacks at BAF facilities. These factors are supplemented with additional particulate emission measurements made using a high-volume sampling method (Oregon Method 8 under isokinetic sampling conditions). Protocols for both the EPA Method 5 and Oregon Method 5 testing programs were submitted to and approved by DEQ.

Continuing Compliance Demonstration

Continuing Compliance Certification

This emissions unit will continue to comply with this applicable requirement.

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Methods of Demonstrating Continuing Compliance

Continuing compliance will be demonstrated by estimating emissions from emission factors based on Method 5 emission tests and from other emission estimating procedures acceptable to DEQ, including Oregon Method 8 sampling results.

Reporting Methods and Frequencies

If additional source tests for particulate emissions are conducted, results of these tests will be reported to DEQ in accordance with IDAPA 58.01.01.157.04. In addition, a summary of the results will be included in the next semi-annual report on monitoring data.

BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I Permit Compliance Report will either certify compliance with this requirement, or if compliance cannot be certified, will provide an appropriate compliance schedule.

RECORDKEEPING REQUIREMENTS - PROCESS C

There are no recordkeeping requirements that are specifically applicable to Process C. Process C emissions units are subject to generic recordkeeping requirements included in the Plant Process.

REPORTING REQUIREMENTS - PROCESS C

There are no reporting requirements that are specifically applicable to Process C. Process C emissions units are subject to generic recordkeeping requirements included in the Plant Process.

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**5. INAPPLICABLE REQUIREMENTS AND
REQUIREMENTS THAT ARE NOT
ENVIRONMENTALLY SIGNIFICANT**

The requirements listed below are judged inapplicable or not environmentally significant for the reasons listed. These requirements are listed in this permit application so that these determinations will be included within the Permit Shield.

Citation	Title	Basis
IDAPA 58.01.01.000 - 004	Legal Authority, Title and Scope; Written Interpretations, Administrative Appeals; Catchlines	Rule does not apply to stationary sources.
IDAPA 58.01.01.005 - 011	Definitions	Rule is not an operating requirement
IDAPA 58.01.01.106	Abbreviations	Rule is not an operating requirement
IDAPA 58.01.01.107	Incorporations by Reference	Rule is not an operating requirement
IDAPA 58.01.01.128	Compliance Requirements by Department	Rule is not an operating requirement
IDAPA 58.01.01.140-149	Variances	Rule is not an operating requirement
IDAPA 58.01.01.162	Modifying Physical Conditions	Rule does not apply to stationary sources.
IDAPA 58.01.01.163	Source Density	Rule does not apply to stationary sources.
IDAPA 58.01.01.204	Permit Requirements for New Major Facilities or Major Modifications in Non-Attainment Areas	Facility not in this geographic area
IDAPA 58.01.01.321-325	Tier I Operating Permit Content	Rule is not an operating requirement
IDAPA 58.01.01.335	General Tier I Operating Permits and Authorizations to Operate	Facility is not a source regulated by this rule
IDAPA 58.01.01.336	Tier I Permits for Portable Sources	Facility is not a source regulated by this rule
IDAPA 58.01.01.360-369	Standard Processing of Tier I Permit Applications	Rule is not an operating requirement
IDAPA 58.01.01.525-538	Registration and Registration Fees	Rule is an administrative requirement only and is not environmentally significant
IDAPA 58.01.01.550-560	Air Pollution Emergency Rule	Rule is not an operating requirement
IDAPA 58.01.01.578	Designation of Attainment, Unclassifiable, and Nonattainment Areas	Rule does not apply to stationary sources.
IDAPA 58.01.01.579-581	Prevention of Significant Deterioration rules	Facility is not a source regulated by this rule
IDAPA 58.01.01.214	Demonstration of Preconstruction Compliance for New and Reconstructed Major Sources of Hazardous Air Pollutants.	Facility is not a source regulated by this rule

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Citation	Title	Basis
IDAPA 58.01.01.224-228	Permit to Construct Application Fees	Rule is an administrative requirement only and is not environmentally significant
IDAPA 58.01.01.387-397	Tier I Registration Fees	Rule is an administrative requirement only and is not environmentally significant
IDAPA 58.01.01.470 (3-7-95)	Permit Application Fees for Tier II Permits (not in IDAPA 58.01 but in Approved SIP)	Rule is an administrative requirement only and is not environmentally significant
IDAPA 58.01.01.563-574	Transportation Conformity	Facility is not a source regulated by this rule
IDAPA 58.01.01.582	Interim Conformity for Northern Ada County	Facility not in this geographic area
IDAPA 58.01.01.609-613, 615-616	Training Fires, Industrial Flares, Residential Solid Waste Disposal Fires, Landfill Disposal Site Fires, Orchard Fires, Dangerous Material Fires, Infectious Waste Burning	Facility is not a source regulated by this rule
IDAPA 58.01.01.626	General Restrictions on Emissions from Wigwam Burners	Facility is not a source regulated by this rule
IDAPA 58.01.01.750-751	Control of Fluoride Emissions	Pollutant not emitted by facility.
IDAPA 58.01.01.785-787	Control of Incinerators	Facility is not a source regulated by this rule
IDAPA 58.01.01.805-808	Control of Hot-mix Asphalt Plants	Facility is not a source regulated by this rule
IDAPA 58.01.01.815-826	Control of Kraft Pulping Mills	Facility is not a source regulated by this rule
IDAPA 58.01.01.835-839	Control of Rendering Plants	Facility is not a source regulated by this rule
IDAPA 58.01.01.845-848	Control of Sulfur Oxide Emissions from Sulfuric Acid Plants	Facility is not a source regulated by this rule
IDAPA 58.01.01.855-858	Combined Lead and Zinc Smelters	Facility is not a source regulated by this rule
IDAPA 58.01.01.859-860	Municipal Solid Waste Landfills	Facility is not a source regulated by this rule
IDAPA 58.01.01.861-862	Hospital/Medical/Infectious Waste Incinerators	Facility is not a source regulated by this rule
IDAPA 58.01.01.790-799	Nonmetallic Mineral Processing	Facility is not a source regulated by this rule
IDAPA 58.01.01.800-802	Permit by Rule Fees	Facility is not a source regulated by this rule
40 CFR Part 49	Tribal Clean Air Authority	Facility is not a source regulated by this rule
40 CFR Part 51	Requirements for preparation, adoption, and submittal of implementation plans	Rule does not apply to stationary sources.
40 CFR Part 55	Outer continental shelf air regulations	Facility not in this geographic area
40 CFR Part 56	Regional Consistency	Rule does not apply to stationary sources.
40 CFR Part 57	Nonferrous Smelter Rules	Facility is not a source regulated by this rule

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Citation	Title	Basis
40 CFR Part 59	National volatile organic compound emission standards for consumer and commercial products	Facility is not a source regulated by this rule
40 CFR Part 60, except Subparts A, Dc and appendices	Standards of performance for new stationary sources	Facility is not a source regulated by this rule
40 CFR 60.13(c), (d), (e), (h)	Monitoring Requirements. – all provisions related to Continuous Opacity Monitoring Systems	Facility has NSPS Subpart Dc Alternative to COMS approved by US EPA pursuant to 40 CFR 60.13(i).
40 CFR 60.47c	Emission Monitoring for Particulate Matter	Facility has NSPS Subpart Dc Alternative to COMS approved by US EPA pursuant to 40 CFR 60.13(i).
40 CFR Part 61, except subpart A, M, and appendices	National emission standards for hazardous air pollutants	Facility is not a source regulated by this rule
40 CFR Part 62	Approval and promulgation of State plans for designated facilities and pollutants	Facility is not a source regulated by this rule
40 CFR Part 63	National emission standards for hazardous air pollutants for source categories	Facility is not a source regulated by this rule
40 CFR Part 67	EPA approval of State noncompliance penalty program	Rule does not apply to stationary sources.
40 CFR Part 71	Federal operating permit programs	Facility is not a source regulated by this rule
40 CFR Part 72	Permits regulation	Facility is not a source regulated by this rule
40 CFR Part 73	Sulfur dioxide allowance system	Facility is not a source regulated by this rule
40 CFR Part 74	Sulfur dioxide opt-ins	Facility is not a source regulated by this rule
40 CFR Part 75	Continuous emission monitoring	Facility is not a source regulated by this rule
40 CFR Part 76	Acid rain nitrogen oxides emission reduction program	Facility is not a source regulated by this rule
40 CFR Part 77	Excess emissions	Facility is not a source regulated by this rule
40 CFR Part 78	Appeal procedures for Acid Rain Program	Facility is not a source regulated by this rule
40 CFR Part 79	Registration of fuels and fuel additives	Facility is not a source regulated by this rule
40 CFR Part 80	Regulation of fuels and fuel additives	Facility is not a source regulated by this rule
40 CFR Part 81	Designation of areas for air quality planning purposes	Rule does not apply to stationary sources.
40 CFR Part 82, except Subpart F	Stratospheric Ozone Protection	Facility is not a source regulated by this rule
40 CFR Part 85	Control of air pollution from mobile sources	Rule does not apply to stationary sources.
40 CFR Part 86	Control of emissions from new and in-use highway vehicles and engines	Rule does not apply to stationary sources.

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Citation	Title	Basis
40 CFR Part 87	Control of air pollution from aircraft and aircraft engines	Rule does not apply to stationary sources.
40 CFR Part 88	Clean-fuel vehicles	Rule does not apply to stationary sources.
40 CFR Part 89	Control of emissions from new and in-use nonroad compression-ignition engines	Rule does not apply to stationary sources.
40 CFR Part 90	Control of emissions from nonroad spark-ignition engines at or below 19 kilowatts	Rule does not apply to stationary sources.
40 CFR Part 91	Control of emissions from marine spark-ignition engines	Rule does not apply to stationary sources.
40 CFR Part 92	Control of emissions from locomotives and locomotive engines	Rule does not apply to stationary sources.
40 CFR Part 93	Determining conformity of Federal actions to State or Federal implementation plans	Rule does not apply to stationary sources.
40 CFR Part 94	Control of air pollution from marine compression-ignition engines	Rule does not apply to stationary sources.
40 CFR Part 96	NOX Budget Trading Program for State Implementation Plans	Facility is not a source regulated by this rule
40 CFR Part 97	Federal NOX Budget Trading Program	Facility is not a source regulated by this rule

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6. COMPLIANCE REPORTING

This section includes four elements:

1. A listing of each type of compliance report that BAF proposes to submit during the term of the Tier I permit, including a schedule for the submittal of each report.
2. A description of the contents of each proposed compliance report, including the sources of information that will be used to prepare each report.
3. The schedule for completing proposed remedial measures needed to establish compliance with applicable requirements for which the Blackfoot Plant is not currently in compliance.
4. The schedule for submittal of Compliance Progress Reports related to remedial compliance measures.

SCHEDULE FOR SUBMITTAL OF COMPLIANCE CERTIFICATIONS

Reporting methods and frequencies are detailed for each emissions unit and applicable requirement in Section 4. These reporting methods and submittal schedules are summarized below.

Description of Report	Recipient	Submittal Schedule
Notification of Startup, Shutdown, or Scheduled Maintenance Event that is Expected to Cause an Excess Emission Event	IDEO	As soon as reasonable possible, but not later than two (2) hours prior to start of event unless BAF demonstrates to DEQ satisfaction that a shorter advanced notice was necessary.
Notification of Upset/Breakdown/Safety Event that Results In Excess Emissions	IDEO	As soon as reasonable possible, but not later than twenty-four (24) hours after the event unless BAF demonstrates to DEQ satisfaction that the longer reporting period was necessary
Written Report on Upset/Breakdown/Safety Event that Results In Excess Emissions	IDEO	15 days after the beginning of the event
Semiannual Reports on Emissions Monitoring	IDEO	Semiannually, March 1 and September 1.

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Description of Report	Recipient	Submittal Schedule
Annual Tier I Permit Compliance Report	IDEO (original); EPA (copy)	Annually on March 1
Notification of Boiler Construction and Startup	IDEO (original); EPA (copy)	As required if there are additional changes or modifications to Boilers.
Notification of Date Upon Which Demonstration of Continuous Monitoring System Performance Commences	EPA (original); IDEO (copy)	Initial notification completed. If a redemonstration of performance is required, notification will be provided 30 days in advance of the new date upon which demonstration of continuous monitoring system performance will commence.
Notification of Anticipated Date for Conducting Opacity Performance Testing – Boiler 2	EPA (original); IDEO (copy)	Notification completed for initial performance testing. Additional notification will be provided not less than 30 days before date for conducting future opacity performance tests.
Performance Test and Performance Evaluation Reports Boiler 2	EPA (2 originals); IDEO (copy)	Within 60 days of completion of performance test or evaluation.
Excess Emissions of Opacity, Particulate Matter or Sulfur Dioxide (NSPS Standards only) from Boiler 2	EPA (original); IDEO (copy)	Semiannually. Will be included in Semiannual Reports on Emissions Monitoring, to be submitted on March 1 and September 1.
SO ₂ Emissions Reports	EPA (original); IDEO (copy)	Semiannually, within 30 days following the end of each reporting period. (For convenience a single SO ₂ Emissions Report will be submitted for both NSPS and non-NSPS regulated emissions.
Notification of Anticipated Date for Conducting non-NSPS Performance Tests	IDEO	Not less than 30 days before date for conducting future opacity performance tests.
Non-NSPS Performance Test and Performance Evaluation Reports	IDEO	Within 60 days of completion of performance test or evaluation.

CONTENTS OF COMPLIANCE REPORTS

The contents for each required compliance report is summarized below.

NOTIFICATION OF STARTUP, SHUTDOWN, OR SCHEDULED MAINTENANCE EVENT THAT IS EXPECTED TO CAUSE AN EXCESS EMISSION EVENT

Reports of Notification of Startup, Shutdown, or Scheduled Maintenance Event that is Expected to Cause an Excess Emission Event will include the following information, per IDAPA 58.01.01.133:

- time of the excess emissions
- specific location
- equipment involved and
- type of excess emissions event (i.e. startup, shutdown, or scheduled maintenance)

NOTIFICATION OF UPSET/BREAKDOWN/SAFETY EVENT THAT RESULTS IN EXCESS EMISSIONS

Reports of Notification of Upset/Breakdown/Safety Event that Results in Excess Emissions will include the following information, per IDAPA 58.01.01.133:

- identify the time
- specific location
- equipment or emissions unit involved, and
- to the extent known, the cause(s) of the occurrence.

WRITTEN REPORT ON UPSET/BREAKDOWN/SAFETY EVENT THAT RESULTS IN EXCESS EMISSIONS

BAF will log observations made during weekly inspections of process stacks for visible emissions. Any indication of a visible emission on the log form will trigger completion of a Visible Emissions Record Form. If the visible emission is determined to be an excess emission, an Excess Emission Report will be submitted to IDEQ.

Excess Emission Reports will include the following information:

- The time period during which the excess emission occurred;
- Identification of the specific equipment or emissions unit which caused the excess emissions;

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- An explanation of the cause, or causes, of the excess emissions and whether the excess emissions occurred as a result of startup, shutdown, scheduled maintenance, upset, breakdown or a safety measure;
- An estimate of the quantity of each regulated air pollutant emitted in excess of any applicable emission standard (based on knowledge of the process and facility where emissions data are unavailable);
- A description of the activities carried out to eliminate the excess emissions;
- Certification of compliance with the requirements of Sections 131, 132, 133.01, 134.01 through 134.03, 135, and 136
- A statement of whether BAF requests consideration of enforcement discretion pursuant to Subsection 131.02. If BAF requests consideration under Subsection 131.02, the report will also certify compliance with Sections 131, 132, 133.01 through 133.03, 134.01 through 134.05, 135, and 136.
- Certification of the report by a Responsible Official.

SEMIANNUAL REPORTS ON EMISSIONS MONITORING

Semiannual reports on emissions monitoring will a summary of all monitoring conducted pursuant to terms of the Tier I permit. For each type of monitoring the following information will be provided:

- A description of the monitoring performed
- The applicable provision(s) of the Tier I permit for which the monitoring was conducted.
- Results of the monitoring conducted.
- Identification of any instances of deviations from Tier I Operating Permit requirements.
- Certification of the report by a Responsible Official.

ANNUAL TIER I PERMIT COMPLIANCE REPORT

The Annual Tier I Permit Compliance Report will document compliance with all terms of the Tier I permit. This report will consist of the following items:

- Letter of Certification

This letter will provide certification of the report by a responsible official.

- Compliance Certifications and Plans

This will consist of an itemized compliance review for each applicable requirement included in the Tier I permit. The certifications and plans will include the following items:

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- The identification of each term or condition of the Tier I operating permit that is the basis of the certification;
- The identification of the method(s) or other means used for determining the compliance status with each term and condition during the certification period, and whether such methods or other means provide continuous or intermittent data. The methods and other means will include the methods and means required by the Tier I operating permit as well as any other material information
- The status of compliance with the terms and conditions of the Tier I operating permit for the preceding year, based on the compliance demonstration methods and means described above. The certification will identify each excursion or exceedance and take it into account in the compliance certification. The certification will also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion or exceedance occurred;
- Other information required to determine the compliance status of the emissions unit.

SCHEDULE OF REMEDIAL MEASURES LEADING TO COMPLIANCE

Applicable requirements with which BAF cannot currently demonstrate compliance are listed below, along with BAF's schedule to establish demonstration of compliance.

IDAPA 16.01.01.201 - Permits for Construction of New or Modified Sources of Air Pollution

BAF has not obtained permits for various projects at the Blackfoot Plant. BAF's Application for Tier II Air Operating Permit identified these projects and applied for permits for these projects. Because BAF is awaiting issuance of the Tier II permit by DEQ, no further remedial measures are required by BAF.

SCHEDULE FOR SUBMITTAL OF COMPLIANCE PROGRESS REPORTS

The only area of noncompliance that might exist at the time the Tier I permit is issued involves obtaining permits for construction of new or modified sources. Noncompliance with this requirement would occur if DEQ has not issued a Tier II permit for the Blackfoot Plant by the time this Tier I permit is issued. If DEQ has not issued a Tier II permit for the plant by the time this Tier I permit is issued, BAF will submit quarterly compliance reports updating the status of Tier II permit issuance.

7. PERMIT SHIELD REQUEST

In submitting this Application for a Tier I Permit, BAF requests that the Tier I permit include a Permit Shield. In accordance with IDAPA 58.01.01.325, BAF requests that the Permit Shield state that compliance with the terms and conditions of the Tier I operating permit, including those applicable to all alternative operating scenarios and trading scenarios, shall be deemed compliance with all of the following

- Applicable requirements as of the date of permit issuance that are specifically identified in the Tier I operating permit and have a corresponding term or condition in the Tier I operating permit.
- Non-applicable requirements.